

City of Long Beach

Analysis of Impediments To Fair Housing Choice



**Analysis of Impediments
to Fair Housing Choice
For
The City of Long Beach**

Prepared By:

The Fair Housing Foundation

&

The Institute for Urban Research and Development

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Acknowledgments

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I. Introduction and Executive Summary

A. Purpose of Analysis

Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of the housing and community development programs administered by The U.S. Department of Housing and Urban Development (HUD). HUD requires all local entitlement jurisdictions receiving grant funding through Community Planning and Development (CPD) programs to engage in fair housing planning and certify that it will take “actions to affirmatively further fair housing.” These programs include 1) Community Development Block Grant (CDBG); 2) Home Investment Partnership (HOME); 3) Emergency Shelter Grant (ESG); and 4) Housing Opportunities for Persons with AIDS (HOPWA). HUD defines this obligation as requiring grantee jurisdictions, at a minimum, to certify that it “will engage in fair housing planning” by:

- (1) conducting at the beginning of each five-year cycle an analysis to identify impediments to fair housing choice within the jurisdiction;
- (2) taking appropriate actions to overcome the effects of any impediments identified through the analysis;
- (3) maintaining records and making available information and reports, including the analysis of impediments, (and) to document actions undertaken to eliminate identified impediments.

HUD’s housing and community development program regulations, handbooks, and notices interpret the statutory requirements in specific standards that entitlement jurisdictions must meet or actions they must take. HUD has interpreted the definition of “affirmatively furthering fair housing” for local jurisdictions to include assurances that:

- a) . . . [racial or ethnic minorities, disabled persons, families with children under 18 years of age and pregnant individuals] receive at least a fair share in proportion to their need of housing resources under the control or allocated by that jurisdiction, and any additional share necessary to remedy any past disproportionate allocation;
- b) Neighborhoods with a preponderance of persons from racial or ethnic minorities receive at least a fair share in proportion to their need of resources under the control of or allocated by that jurisdiction used for housing-related services, and any additional share necessary to remedy any past disproportionate allocation;
- c) Impediments to integration will be eliminated and the jurisdiction will take steps to promote mobility and integration;
- d) There is an effective mechanism for enforcement of fair housing laws within the applicant jurisdiction and mechanisms in effect within the governing body of the

jurisdiction to ensure that no subdivision or subpart of the governing body is engaging in discrimination against members of a protected class;

- e) Barriers to use resources by person in protected classes will be eliminated;
- f) The jurisdiction completes and fully implements an acceptable Fair Housing Plan according to the provisions of this part.

As a result, HUD requires all jurisdictions that receive CPD funds to complete an "Analysis of Impediments to Fair Housing Choice (AI)." Pursuant to Title 24 Code of Federal Regulations (CFR) 570.904 (c), entitlement jurisdictions are required to conduct "... [an] analysis to determine the impediments to fair housing choice for its housing and community development programs and activities."

HUD defines "impediments to fair housing choice" as "any actions, omissions, or decisions made on the basis of race, color, religion, sex, handicap (disability), familial status or national origin that restricts housing choice or the availability of housing choices of people in these protected classes." In addition to the HUD protected classes, the state of California expands protected coverage to include marital status, ancestry, sexual orientation or arbitrary characteristics, such as age or sources of income.

According to HUD, the AI should involve:

1. a comprehensive review of the entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
2. an assessment of how those laws, etc. affect the location, availability, and accessibility of housing;
3. an assessment of conditions, both public and private, affecting fair housing choice for all protected classes;
4. an assessment of the availability of affordable, accessible housing in a range of unit sizes;
5. any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices;
6. any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

HUD also cites three primary purposes of the AI. The AI:

1. serves as the substantive, logical basis for fair Housing Planning;

2. provides essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates;
3. assists in building public support for fair housing efforts both within a State or Entitlement jurisdiction's boundaries and beyond.

In compliance with the aforementioned requirements, the City of Long Beach contracted with the Fair Housing Foundation (FHF) to perform its analysis of impediments to fair housing choice in 2001. Founded in 1964, the Fair Housing Foundation is a private non-profit, non-partisan educational agency dedicated to promoting the enforcement of fair housing laws and encouraging an atmosphere of open housing through education, enforcement activities, counseling services and outreach programs.

The Fair Housing Foundation has contracted with the Institute for Urban Research and Development (IURD) to collaborate on the development of this AI study for the City of Long Beach. IURD is a community-based research organization that has completed AI studies for cities throughout Los Angeles County. The findings in this report are based upon several sources of data and related reports that were analyzed by IURD. Together, the two agencies compiled recommendations for all of the primary findings (see section C. Key Findings and Recommendations) for review and ratification by City staff. The Key Findings and Recommendations have been incorporated into a Fair Housing Plan for the City of Long Beach (see section V. Fair Housing Plan).

B. Methodology

The report that follows is the result of a comprehensive review of policies, procedures, and practices within the City of Long Beach that affect the location, availability, and accessibility of housing and current residential conditions related to fair housing choice. The study is based in large part on the “suggested” components contained within the Fair Housing Planning Guide, Volume I developed by The Department of Housing and Urban (HUD). Specifically, in preparing the AI study HUD encourages the use of:

- 1) sources of relevant demographic information and data;
- 2) sources of authoritative studies of housing discrimination, lending, and other fair housing issues;
- 3) methods for obtaining diverse citizen participation in the development, implementation, and evaluation of fair housing planning; and
- 4) corrective actions and solutions.

Accordingly, the report is primarily based on the following sources of information:

Housing Complaint Data – on discrimination issues and general housing concerns, available through the Fair Housing Foundation, was reviewed and analyzed for general trends and fair housing concerns.

City of Long Beach Consolidated Plan: 2000-2005 - was obtained from the City of Long Beach for analysis.

City of Long Beach General Plan Housing Element - was obtained from the City of Long Beach for analysis.

The City of Long Beach Zoning Code (Title 21) - was analyzed for exclusionary and discriminatory land use practices.

Federal Financial Institutions Examination Council Census Reports - provided median family income, persons living in poverty, and income level by census tract.

Focus Group Session with Community Representatives in Long Beach - was conducted with residents and community service providers, including housing consumers and providers.

Focus Group Session with Housing Brokerage Service Professionals in Long Beach - was conducted with real estate and property management professionals doing business in Long Beach.

Home Mortgage Disclosure Act (HMDA) data - was provided by GeoDataVision (Wallingford, CT). Home Mortgage Disclosure Act provides information about loan applicants and loan refusal rates. This data made it possible to analyze lending patterns by census tracts.

Housing Discrimination Study (HDS) data - available through HUD provided information concerning discrimination in rental and sales of housing in Los Angeles County.

Random Audits of Rental Vacancies – Targeted random audits of rental vacancies conducted in the Spring of 2001 along with random audits conducted annually by the Fair Housing Foundation were analyzed for this study.

Access to Housing Credit: General Background Information – Prepared in 1996 by Gary Dymski, Ph.D., Department of Economics, University of California at Riverside.

1990 U.S. Census Data - was analyzed for local jurisdiction background information concerning age, ethnicity, gender, households (including occupancy, relationship, tenure, and type) and total population.

2000 U.S. Census Data - was analyzed for local jurisdiction background information concerning age, ethnicity, gender, households (including occupancy, relationship, tenure, and type) and total population.

C. Summary of Public Consultation and Community Input

As a component of the Consolidated Plan, citizen participation is a required element of the Analysis of Impediments study. However, in that many jurisdictions complete the AI study separate and apart from the Consolidated Plan, HUD does not expect jurisdictions to follow the same strict citizen participation requirements with the AI study.

However, HUD does expect jurisdictions to develop an AI that involves and addresses concerns of the entire community. In so doing, the AI structure should provide for “clear and continuous exchange of concerns, ideas, analysis and evaluation of results.” Community officials should ensure, through focus groups, an advisory commission, town meetings or other effective means, that regular contact and working arrangements are created and maintained with: fair housing organizations, other governments, advocacy groups, housing providers, financial institutions, educational institutions, other organizations and the general public.

Once the AI is completed, HUD encourages jurisdictions to communicate conclusions and recommendation to top policy makers, key Government staff, community organizations, and the general public. HUD suggests that jurisdictions should:

- Provide a copy to organizations and individuals participating in the AI process and other organizations focusing on housing issues;
- Advise the general public by holding meetings or other public forums in accessible meeting facilities with sign language interpreters and other accommodations made available;
- Provide a means other than public forums for other citizen participation (e.g. written comment, comment via the electronic media) regarding the conclusions and recommended actions resulting from the AI;
- Publicize key aspects of the AI;
- Utilize alternative formats (e.g. Braille, large type, tapes or readers) for persons with visual impairments;
- Have sufficient copies on hand to distribute to the public, upon request;
- Brief key officials and staff in the Government as well as community organizations that express an interest.

Obtaining strong and broad-based support for the ensuing fair housing actions is critical to the long-term success of the jurisdictions efforts to affirmatively further fair housing.

The City of Long Beach and its consultants preparing this Analysis of Impediments study utilized a number of avenues for incorporating public consultations and community input into this study. The process included:

1. Community Focus Groups/Public Consultations
2. The Community Development Advisory Commission
3. Public Distribution of AI Study Results
4. Written Public Comments

1. Community Focus Groups/Public Consultations

In order to provide for substantive community input into the AI study as it was being prepared, six focus group sessions were scheduled – three with representatives of neighborhood groups and community-based organizations, two with the general public at-large and one with representatives of housing providers. An aggressive effort was made to include a broad representation of community participants in the process. This effort included:

- Letters were sent to over sixty city leaders and representatives of neighborhood groups and community-based organizations seeking participation in the community focus group sessions.
- Public notices were posted in local publications and distributed citywide announcing the sessions scheduled for the general public.
- Letters for the housing providers session were distributed through local realtor associations and apartment owners and managers groups.
- Special meetings were scheduled with key informants to ensure their participation in the process.

A list of the individuals and organizations invited to participate is attached to this document as part of Appendix B. Unfortunately, there was very limited response to the solicitations for participation from community representatives, city officials and the general public. While the information provided by those that did participate in the community focus groups was very informative, the participation was not reflective of the very diverse communities of interest in the City of Long Beach. Thus, a separate section on the community focus group sessions was not included in the final version of this study. However, information provided at the sessions held was incorporated into the overall review of the issues and concerns discussed in this study. Information gathered from a meeting with Dennis Rockway of the Legal Aid Foundation of Los Angeles, Long Beach office, was also incorporated into the study. Information gathered from the focus group with housing professionals is included as a section within the study (Section IV.D. Provision of Housing Brokerage Services.)

2. Community Development Advisory Commission

The City of Long Beach Community Development Advisory Commission, a 15-member volunteer commission representing various community interests, provides oversight on HUD Consolidated Plan programs. The AI consultants attended a regularly scheduled meeting of the commission held on February 21st, 2001, to introduce the AI process to commissioners and seek their input in the development of the study. Commissioners were presented with an outline of the scope of work for the study and a list of the organizations and individuals to be invited to participate in the community focus groups.

A draft of the AI was presented to commission members at its regularly scheduled meeting on August 15th, 2001. Commissioners were provided an oral presentation on the key findings and recommendations contained in the study. Commissioners were

encouraged to review the document over the next 30 days and provide comments before voting on adopting the documents at their September 19th meeting.

At its regularly scheduled meeting held on September 19th, 2001, the Community Development Advisory Commission held a discussion on the draft of the AI study. Following a question and answer period with the consultants, the commission opened the floor for public comments on the AI study. Written comments were received from three community representatives which have been attached in their entirety to this study. Following public comments, Commission members voted to adopt the Analysis of Impediments study on behalf of the City of Long Beach.

3. Public Distribution of AI Study Results

As noted above, the AI study was first presented for public review at a meeting of the Community Development Advisory Commission held on August 15th, 2001. The draft document was also mailed to key individuals seeking their comment and input on the study results.

The final draft of the AI study will be distributed to the following individuals and organizations for review and use when developing housing policy or in the development or rehabilitation of housing:

- Mayor Beverly O'Neill
- Members of the City Council
- City Manager Henry Toboada
- All City of Long Beach Department Directors
- The Long Beach Redevelopment Agency
- The Long Beach Housing Development Company
- The Legal Aid Foundation of Los Angeles – Long Beach Office
- The Long Beach Planning Commission
- The Long Beach Housing Authority
- The Long Beach Community Development Advisory Commission

Copies of the AI study can be obtained from the City of Long Beach Department of Community Development Department Neighborhood Services Bureau upon request and will be available for public review at the Long Beach Main Library and all branch libraries and the Neighborhood Resource Center. A copy will also be posted on the City of Long Beach website.

4 Written Public Comments

Written comments on the AI study were presented to the Community Development Advisory Commission at its regularly scheduled meeting held September 19th, 2001. Some revisions were made to this document based on the written comments. All written comments received are attached in their entirety to this document as Appendix B.

D. Key Findings and Recommendations

It is important to note that carrying out this analysis alone is not considered to constitute compliance with requires to certify that a jurisdiction is affirmatively furthering fair housing in and of itself. Actions must be undertaken to address the impediments identified through this study. The following key findings and recommendations are presented in order to help the City of Long Beach continue its efforts to reduce and eliminate barriers to fair housing choice.

Concerning Jurisdictional Profile

Key Finding 1: While Whites make up 33.1% of the total population of the City, there is a significant segregation pattern in the eastern part of the city where 17 census tracts contain a White population of 75% or more of the total population of each census tract.

Recommendation 1: The City of Long Beach and the Fair Housing Foundation should conduct an investigation in the eastern part of the city to determine whether such segregation is based upon discriminatory housing practices. Recommendations for conducting a thorough investigation are outlined in Section V. Fair Housing Plan.

Summary: Citywide population numbers show Long Beach to have a very diverse population in terms of race and ethnicity. No one racial or ethnic group makes up a majority of the City's population. Latinos and Whites represent about one-third of the population each (35.8% and 33.1% respectively) while African Americans and Asian Americans each represent more than one of every eight residents (14.5% and 13.1% respectively). Despite the Citywide diversity, there is a clear pattern of segregation among Whites living in the City. Over two-thirds of the White population in Long Beach (68%) live in census tracts where Whites make up more than fifty percent of the residents. Thirty of the thirty-six census tracts where this is the case lie within the eastern part of the city and seventeen of those have White populations of more than 75%. There are a wide range of possible reasons for why this pattern of segregation exists including economics and historical housing trends in the area. We suggest the City take a closer look at this issue to ensure that equal housing opportunities are available for all populations in the eastern part of the city.

Concerning Evaluation of Current Fair Housing Profile

Key Finding 1: Based on client data collected by the Fair Housing Foundation, Black/African American households face a disproportionate number of fair housing issues in the City of Long Beach. Black/African American households, which represent 14.5% of the city's total population, represented 36.7% of the clients reporting housing complaints or concerns and filed 45% of the housing discrimination complaints over the last five years.

Recommendation 1: The City of Long Beach and the Fair Housing Foundation should conduct a citywide investigation into potential discriminatory housing practices

specifically faced by African Americans. Recommendations for conducting an investigation are outlined in Section V. Fair Housing Plan.

Summary: More than one out of every three clients (36.7%) seeking assistance from the Fair Housing Foundation is African American. This stands in stark contrast to the fact that African Americans represent less than one of every six (14.5%) Long Beach resident. Almost half (45.1%) of the clients filing complaints alleging housing discrimination in Long Beach during the last five years have been African American. More than half (50.7%) of the discrimination allegations presented by African Americans were on the basis of race and they represented almost two-thirds of all clients alleging racial discrimination. African Americans also represented more than two of every five clients (43.3%) facing eviction issues in Long Beach, more than one-third of every client (37%) with habitability issues and almost half of every client citing a refusal to rent (49.2%) as their chief complaint. Such an overwhelmingly disproportionate percentage of complaints by one ethnic population in the community present some serious concerns about community-wide housing practices toward that population. We suggest that the City conduct a closer examination into whether African Americans are systematically receiving differential treatment in the Long Beach housing market.

Key Finding 2: Based on client data collected by the Fair Housing Foundation, Female-headed Households face a disproportionate number of housing issues in the City of Long Beach. Female-headed Households represent 16.1% of the city's total population and 48.6% of households reporting housing concerns or complaints.

Recommendation 2: The City should conduct a special review of the housing concerns or complaints specifically faced by female-headed households and develop remedies to address the problems. Specific recommendations for conducting such a review are outlined in Section V. Fair Housing Plan.

Summary: Less than one out of every six households (16.1%) in Long Beach is headed by a female and only one in ten (10.6%) is headed by a single female with children. Yet, almost half (48.6%) of the individuals reporting housing complaints and concerns to the Fair Housing Foundation are from female-headed households. The percentage of clients from female-headed households represents more than three times the percentage of female-headed households in the community. Single females with children represented more than half of the clients (53.9%) alleging discrimination on the basis of familial status more than five times their representation within the community. Female-headed households also represented more than half of all clients alleging discrimination on the basis of race (51.3%) and more than two-thirds based on harassment (68.75%), most often sexual harassment. More than half of the clients with habitability issues (52.8%) and almost half with eviction concerns (47.6%) were from female-headed households. Almost half of the clients with harassment concerns (49.4%) and an alarming majority of illegal entry complaints (59%) were from female-headed households presenting a very real safety concern for the community to examine. Almost nine out of ten (87.4%) of the female-headed households reporting housing concerns were from low or very low-income households. The grossly disproportionate number of female-headed

households, particularly single females with children facing obstacles in the housing market is an alarming trend that warrants special attention in our communities. This is a phenomenon that requires much more in-depth study to determine the nature and extent of the concerns faced by female-headed households and how they can be addressed.

Key Finding 3: Based on client data collected by the Fair Housing Foundation, Asian and Hispanic/Latino households are underrepresented among those reporting housing concerns or complaints. Asians represent 13.1% of the city's total population and only 1.9% of households reporting housing concerns or complaints and Hispanics/Latinos represent 35.8% of the city's total population and 23.8% of households reporting housing concerns or complaints

Recommendation 3: The City of Long Beach and the Fair Housing Foundation should conduct an expanded effort to promote tenant rights and fair housing laws to Asian and Hispanic/Latino households in English, Spanish and appropriate Asian languages.

Summary: Less than one of every four (23.8%) people seeking assistance with housing concerns from the Fair Housing Foundation are Latino despite the fact that they represent more than one-third (35.8%) of the City's residents. Only one in six clients filing discrimination complainants were Latino (15.4%). Asian American residents of Long Beach are significantly underrepresented amongst those seeking housing assistance (2% clients compared to 13.1% residents). While these numbers could suggest that these populations are not experiencing a high rate of housing concerns and issues in Long Beach, they could also suggest that when individuals within these populations do experience differential treatment or have other problems in the housing market it is not being reported. We suggest an expanded education and outreach effort be conducted targeting the Latino and Asian communities of Long Beach to promote greater consumer awareness of their rights under fair housing and California tenant laws.

Concerning Identification of Impediments to Fair Housing Choice

Random Audits of Housing Vacancies:

Key Finding 1: Based on random audits of rental housing conducted over the last five years, African Americans face significant obstacles to fair housing choice in the City of Long Beach.

Recommendation 1: The City of Long Beach and the Fair Housing Foundation should conduct a citywide investigation into potential discriminatory housing practices faced by African Americans. Recommendations for conducting an investigation are outlined in Section V. Fair Housing Plan.

Summary: The results of the random audits of rental vacancies conducted by the Fair Housing Foundation over the last five years suggest that African-Americans consistently face barriers to fair housing choice when seeking housing opportunities in the City of

Long Beach. Barriers faced by African American testers during the audits included misrepresentation of apartment availability, higher rents quoted, discouraging comments offered or actions made by rental agents, and steering to other apartments located elsewhere. Combined with discrimination complaint information filed with the Fair Housing Foundation, there is a clear pattern of differential treatment experienced by African Americans in Long Beach. As stated above, we suggest that the City conduct a closer examination into whether African Americans are systematically receiving differential treatment in the Long Beach housing market.

Key Finding 2: Based on scouting for rental vacancies and audits of rental housing, a significant number of rental vacancies are advertised only in Spanish or Khmer creating a barrier to fair housing choice for households that do not speak these languages.

Recommendation 2: The City of Long Beach and the Fair Housing Foundation should conduct a targeted citywide education campaign and intensify efforts to provide training and counseling to educate property owners and managers about potential housing discrimination and their obligations under Fair Housing Laws. Such training should emphasize the need to advertise and communicate to consumers in English as well as other language(s) spoken in the community.

Summary: Vacancy scouting efforts as well as complaints from consumers have identified numerous rental properties in the community with vacancy signs in Spanish or Khmer only. Scouting for vacancies through print media advertisements has revealed vacancy listings in non-English publications that are not advertised in English publications. In addition to vacancy advertising, English speaking testers have run into language barriers during audits that included property managers that did not speak English, did not respond to inquiries made in English and property information available only in languages other than English. Advertising vacancies and/or conducting housing business in a single language other than English presents a clear impediment to housing opportunities to the majority of potential consumers who do not speak that language. Rather than initiating enforcement actions against housing providers conducting business this way, we recommend that a targeted education and outreach effort be conducted first in order to ensure that housing providers in the community are aware of their obligations under fair housing laws.

Provision of Financing for Residential Dwellings:

Key Finding 1: An examination of year 2000 HMDA data show a noticeable gap citywide in home loan origination and denial rates between white applicants and minority applicants favoring white applicants.

Recommendation 1: The City of Long Beach should conduct a detailed examination and analysis of home mortgage lending patterns and practices in the residential credit market to determine if there is a pattern and practice of discriminatory lending and/or redlining taking place in the City.

Recommendation 2: The City of Long Beach should initiate expanded dialogues with representatives of lending institutions participating in the residential credit market in the City to determine what can be done to increase lender performance in awarding credit to African American and Hispanic/Latino households.

Summary: There were a total of 19,272 home loan applications in the City of Long Beach during the year 2000. Almost four out of every ten (39.3%) loan applicants were white, while more than one in three (35%) were minority. Hispanic/Latinos represented only one in every six loan applicants (16.6%) well below their representation within the city (35.8%). Black/African American and Asian/Pacific Islander applicants represented less than one of every ten applicants (9.2% and 7.1% respectively), both more than five percent below their representation within the City (14.5% and 13.1%) respectively. Examining these numbers by percentage of applications within each racial/ethnic group, there are noticeable gaps between origination and denial rates for white applicants and minority applicants in Long Beach. There is a significant difference (12.2%) in the loan origination rate for white applicants (63.5%) and that for minority applicants (51.3%). The difference in denial rates is also significant (7.9%) between white (15.8%) and minority applicants (23.7%). The gap in origination rates is widest for African American applicants who had an origination rate of less than half the loan applicants (47.1%). Half of the loan applications made by Latino applicants (50.6%) were originated while Asians applicants had an above average origination rate (54.4%). The gap in denial rates is again widest for African Americans with more than one quarter (26.6%) of the applicants denied followed by Latinos with almost one-quarter (24.2%) denials. Asian applicants had one in five applicants denied (20.8%). Low-to-moderate-income white applicants experienced above average origination rates (54.3%) and below average denial rates (18.8%). Less than half of the low-to-moderate-income minority applicants (47.2%) had their loans originated and more than one-quarter had loans denied. The difference is even greater in origination rates among middle and upper income applicants with a gap of 10.5% between white origination rates (64.8%) and minority origination rates (52.1%) and 7.6% between white denial rates (15.4%) and minority rates (23%). This data is merely “suggestive” and hardly enough to determine that there is a systematic practice of discriminatory lending taking place in Long Beach. Yet, there is enough of a pattern here that, combined with other trends identified in this study, suggest that more detailed study and analysis is needed to determine if there is systematic differential treatment for minorities, particularly African Americans and Latinos, taking place in the Long Beach residential credit market.

Land Use and Zoning:

Key Finding 1: The Zoning Code distinguishes Senior Citizen Housing from other Single-Family Residential and Multi-Family Residential uses by the application of a conditional use permit.

Recommendation 1: The residential use classifications of Senior Citizen Housing should be amended so that they are treated identically to other similar Single-Family Residential and Multi-Family Residential uses.

Summary: The House Committee Report accompanying the Fair Housing Act as amended in 1988 (FHAA) stated that the Act was “intended to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of (the disabled) to live in the residence of their choice in the community.” (H.R. Rep. No. 100-711, 100th Cong., 2nd Sess. 24,1988). Seniors are protected by the FHAA if they “(1) have a physical or mental impairment which substantially limits one or more of such person’s major life activities, (2) a record of having such an impairment, or (3) being regarded as having such an impairment.” One court has specifically held that, since the elderly as a group are “regarded as disabled,” they are covered by the FHAA (Casa Marie, Inc. v. Superior Court of P.R., 752 F. Supp.1152, 1168 (D.P.R. 1990) (Clearinghouse No. 46, 262).

Key Finding 2: The Zoning Code distinguishes Handicapped Housing from other Single-Family Residential and Multi-Family Residential uses by the application of a conditional use permit.

Recommendation 2: The residential use classifications of Handicapped Housing should be amended so that they are treated identically to other similar Single-Family Residential and Multi-Family Residential uses.

Summary: The House Committee Report accompanying the Fair Housing Act as amended in 1988 (FHAA) stated that the Act was “intended to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of (the disabled) to live in the residence of their choice in the community.” (H.R. Rep. No. 100-711, 100th Cong., 2nd Sess. 24,1988).

Key Finding 3: The use classification of Social Service Office (without food distribution) is used to require non-profit organizations to apply for a Conditional Use Permit (CUP) for offices for business transactions and service provision while other type of organizations (for-profit organizations) are not so required.

Recommendation 3: The use classification of Social Service Office (without food distribution) should be amended so that it is treated identically to the use classification Professional Services.

Summary: An office is defined as "a place where business is transacted or a service is provided, with an emphasis on record keeping, clerical and administrative activities. (Ord. C-6533 § 1 (part), 1988). Professional services include accounting, advertising, architecture, artist studio, bookkeeping, business headquarters, chiropractic, computer programming, consulting, contracting, dentistry, engineering, insurance, law, marketing, medicine, photography, psychiatry, psychology, real estate, or tax preparation. The antidiscrimination provision in Title II of the Americans With Disabilities Act (ADA), 42 U.S.C. Sections 12131 – 12134 employs expansive language intended to reach all actions taken by public entities; it states as follows: “(N)o qualified individual with a

disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by such entity.”

Accessibility of Housing for People with Disabilities:

Key Finding 1: The City of Long Beach presently makes no specific reference to the accessibility requirement contained in the 1988 amendment to the Fair Housing Act in its municipal code nor is there any provision for monitoring compliance.

Recommendation 1: The City of Long Beach planning and building codes should be amended to adopt the ICC Code Requirements for Housing Accessibility (CHRA) as part of its municipal code.

Recommendation 2: The City of Long Beach should conduct a study of new housing construction in the City over the last ten years to review compliance with the accessibility guidelines contained in the Fair Housing Act.

Summary: HUD has called upon jurisdictions in their AI study to review their building codes to determine if they have incorporated accessibility requirements of Section 504, the Fair Housing Act, Title II of the ADA, etc. for both multifamily and single family housing. HUD officially endorsed a new building code document that clarifies the federal Fair Housing Accessibility Guidelines for planners and builders to ensure that new multifamily housing developments are accessible to people with disabilities. The “Code Requirements for Housing Accessibility” (CRHA) published by the International Code Council (ICC) clearly communicates in building code language the federal multifamily construction accessibility requirements contained in the Fair Housing Act. The CRHA was designed to enable local jurisdictions to adopt these codes and enforce provisions that are at least equivalent to the Act’s requirements through their routine code enforcement activities. The Accessibility guidelines provided in the CHRA should be spelled out completely and not just referenced in the code in order to provide guidance to all planners and builders seeking approvals and permits from the City. Having building code requirements consistent with the accessibility requirements of the Fair Housing Act will significantly increase the amount of accessible multifamily housing available in the City.

Key Finding 2: VisitAbility is a nationwide movement endorsed by HUD to enhance the user-friendliness of all housing to include the needs of everyone, regardless of their physical abilities.

Recommendation 3: The City of Long Beach should adopt a “Visitability Ordinance” calling for new housing construction in the City that uses public financial assistance to meet minimal visitability standards.

II. Jurisdictional Background Data

HUD states that the purpose of this section is "to provide background data and other information that serve as the bases for identifying impediments and making conclusions." HUD suggests that this section should include the background data presenting the community's population profile in the following categories: demographic, income, and housing. Thus, the primary purpose of this subsection is to identify demographic, income, and housing trends among the city's general population and later compare these trends with other identified trends concerning fair housing activities and issues in other sections throughout this report.

A. Demographic Trends

1. Population Growth

The City of Long Beach has experienced periods of rapid growth during the last century unlike any other city in Los Angeles County. The six (6) most populated cities in Los Angeles County during the period of 1890 through 1930 were Glendale, Long Beach, Los Angeles, Pasadena, Pomona and Santa Monica.

Table 1. Six Most Populated Cities in Los Angeles County: 1890 - 1930

City	1900		1910		1920		1930	
	Rank	Population	Rank	Population	Rank	Population	Rank	Population
Glendale	-	-	6	2,746	5	13,536	4	62,736
Long Beach	5	2,252	3	17,809	2	55,593	2	142,032
Los Angeles	1	102,479	1	319,198	1	576,673	1	1,238,048
Pasadena	2	9,117	2	30,291	3	45,354	3	76,086
Pomona	3	5,526	4	10,207	6	13,505	6	20,804
Santa Monica	4	3,057	5	7,847	4	15,252	5	37,146

Source: U.S. Census Bureau Data; California Department of Finance

As noted in the table above, Long Beach became the second most populated city in Los Angeles County in 1920 surpassing Pasadena. Between 1910 and 1920 the City of Pasadena's population doubled in size. Long Beach's population, however, more than tripled in size between 1910 and 1920 and nearly tripled again between 1920 and 1930.

Table 2. City of Long Beach Total Population Growth: 1940 - 2000

Year	Population	% of Change
1940	164,271	
1950	250,767	52.7
1960	344,168	37.2
1970	358,879	4.3
1980	361,355	0.7
1990	429,433	18.8
2000	461,522	7.5

Source: U.S. Census Bureau Data; California Department of Finance

Table 2 reveals that the City's population growth has been more modest during the past 60 years. Its population has nearly tripled again but during the 60 year period of 1940 through 2000. Long Beach's population increased by nearly 100,000 residents between 1980 and 2000 which represents an increase of 27.7%.

Long Beach will likely remain one of the largest cities in the State of California. According to 2000 U.S. Census Bureau, Long Beach remained the fifth largest city. The table below lists Long Beach as the fifth largest city in 1990 and 2000.

Table 3. Fifteen (15) Largest Cities in California in 2000.

		Population		Population Change	
		2000	1990	Number	Percent
1	Los Angeles	3,694,820	3,485,398	209,422	6.0
2	San Diego	1,223,400	1,110,549	112,851	10.2
3	San Jose	894,943	782,248	112,695	14.4
4	San Francisco	776,733	723,959	52,774	7.3
5	Long Beach	461,522	429,433	32,089	7.5
6	Fresno	427,652	354,202	73,450	20.7
7	Sacramento	407,018	369,365	37,653	10.2
8	Oakland	399,484	372,242	27,242	7.3
9	Santa Ana	337,977	293,742	44,235	15.1
10	Anaheim	328,014	266,406	61,608	23.1
11	Riverside	255,166	226,505	28,661	12.7
12	Bakersfield	247,057	174,820	72,237	41.3
13	Stockton	243,771	210,943	32,828	15.6
14	Fremont	203,413	173,339	30,074	17.3
15	Glendale	194,973	180,038	14,935	8.3

Source: U.S. Census Bureau Data; California Department of Finance

2. Ethnic Transition

As the city's population has changed, so has its ethnic make up. Hispanics or Latinos represent the largest group of residents (35.8%). They doubled in size between 1980 and 1990 and increased by 62.8% between 1990 and 2000. During this same period of time Whites steadily decreased. They made up approximately two-thirds (68%) of the city's residents in 1980 and one-third (33.1%) in 2000.

Table 4. Comparison of Ethnicity: 1980 - 2000.

Ethnicity*	1980		1990		2000	
	#	%	#	%	#	%
Asian	20,758	06	55,234	13	60,329	13.1
Black or African American	40,034	11	56,805	13	66,836	14.5
Hispanic or Latino	50,700	14	101,419	24	165,092	35.8
White	244,594	68	212,755	50	152,899	33.1
Other	5,248	1	3,220	1	16,366**	3.5
Total:	361,334	100.0	429,433	100.0	461,522	100.0

*ethnic names listed are those used by the U.S. Census Bureau for the 2000 Census

**includes American Indian and Alaska Native, Some Other Race, and Two or More Races.

Source: U.S. Census Bureau Data.

Asians and Blacks or African Americans grew modestly between 1990 and 2000. Asians nearly tripled in size between 1980 and 1990 but increased by a little more than 5,000 residents (or 9.2%) between 1990 and 2000. Blacks or African Americans comprised 13% of the city's residents in 1990 and 14.5% in 2000.

The following two tables provide a break down of Hispanics or Latinos and Asians by nationality and compares each group between 1990 and 2000.

Table 5. Comparison of Hispanics or Latinos By Nationality: 1990 and 2000.

	1990		2000		Variance	
	#	%	#	%	#	%
Mexican	80,523	79.4	127,129	77.0	46,606	-2.4
Puerto Rican	2,063	2.0	2,339	1.4	276	-0.6
Cuban	1,044	1.0	1,067	0.7	-23	-0.3
Other Hispanic or Latino	17,789	17.6	34,557	20.9	16,768	+3.3
Hispanic Latino - Total:	101,419	100.0	165,092	100.0	63,673	

Source: U.S. Census Bureau Data.

Mexicans continue to be the majority of Hispanics or Latinos within the city. There were 46,606 more Mexicans in 2000 than there were in 1990. This presents an increase of 57.9%. However, it is worth noting that Mexicans comprised 77% of the Hispanic or Latino population in 2000 which is slightly less (79.4%) in 1990. Conversely, all other Hispanics or Latinos made up 23% in 2000--a slight increase (20.6%) over 1990.

Table 6. Comparison of Asians By Nationality: 1990 and 2000.

	1990		2000		Variance	
	#	%	#	%	#	%
Chinese	3,771	7.1	3,550	6.4	221	-0.7
Filipino	17,329	32.6	18,608	33.5	1,279	+0.9
Japanese	3,531	6.7	3,147	5.7	384	-1.0
Asian Indian	1,464	2.8	1,338	2.4	126	-0.4
Korean	1,489	2.8	1,608	2.9	119	+0.1
Vietnamese	5,112	9.6	5,074	9.1	38	-0.5
Cambodian	17,468	32.9	22,266	40.0	1,882*	+1.6**
Hmong	271	0.5				
Laotian	841	1.6				
Thai	621	1.2				
Other Asian	1,183	2.2				
Total:	53,080	100.0	55,591	100.0		

*represents the difference between the sum of Cambodians, Hmong, Laotian, Thai, and other Asian which equaled 20,384 in 1990 and 22,266 in 2000.

**represents the difference between the total percentage of Cambodians, Hmong, Laotian, Thai, and other Asian which equaled 38.4% in 1990 and 40.0% in 2000.

Source: U.S. Census Bureau Data.

Current 2000 census data does not breakdown Asians by all of the nationalities broken-down within 1990 census data as noted in table 6 below. Among those nationalities that were, Filipinos increased the most and Japanese and Chinese decreased the most. Hopefully, data concerning the rest of the nationalities will be available soon. In particular, data concerning Cambodians would be useful considering Cambodians were the largest nationality group in 1990.

3. Age

Table 7 shows that the city's under age 18 population has steadily increased over the past few decades. In 1980 the number of residents under age 18 represented 22.9% of the population, 25.4% in 1990, and 28.7% in 2000.

Table 7. Comparison of Age: 1980 - 2000.

Age Category	1980		1990		2000	
	#	%	#	%	#	%
Under Age 18	82,638	22.9	109,089	25.4	132,639	28.7
Age 18 and Over	278,696	77.1	320,344	74.6	328,883	71.3
Total:	361,334	100.0	429,433	100.0	461,522	100.0

Source: U.S. Census Bureau Data.

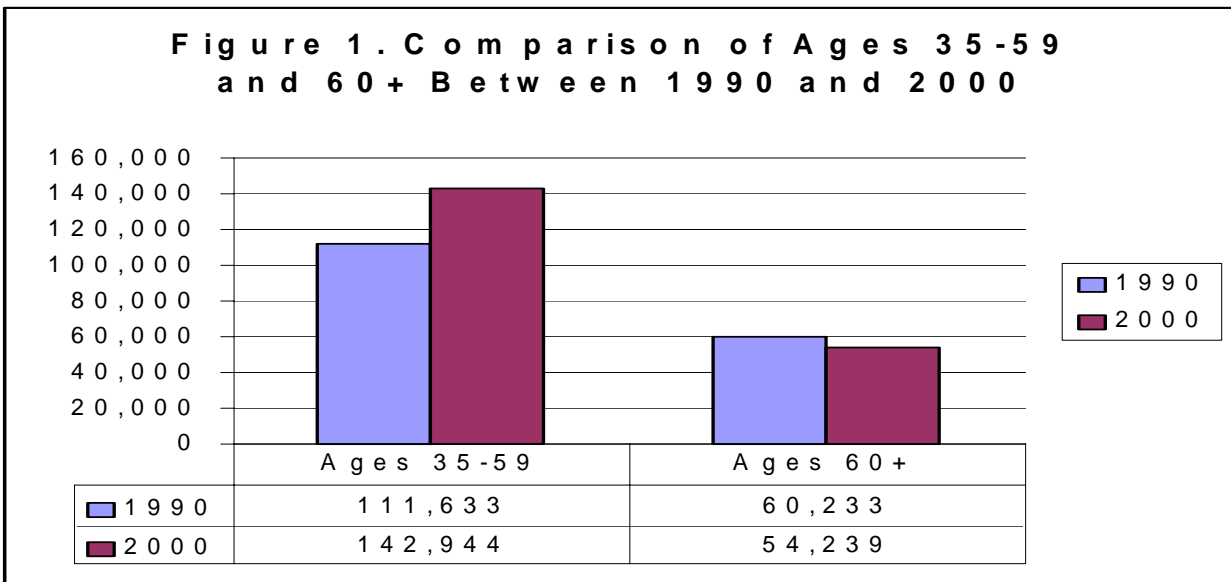
The next table lists all age groups and related data provided by the U.S. Census Bureau for 1990 and 2000.

Table 8. Comparison of Age Groups: 1990 and 2000.

Age	1990		2000	
	#	%	#	%
Under 5 Years	37,669	8.8	38,587	8.4
5 to 9 Years	31,886	7.4	41,349	9.0
10 to 14 Years	25,539	5.9	35,641	7.7
15 to 19 Years	27,527	6.4	33,542	7.3
20 to 24 Years	44,045	10.2	35,678	7.7
25 to 34 Years	90,901	21.2	79,542	17.2
35 to 44 Years	63,038	14.7	72,342	15.7
45 to 54 Years	35,043	8.2	53,390	11.6
55 to 59 Years	13,552	3.1	17,212	3.7
60 to 64 Years	13,770	3.2	12,337	2.7
65 to 74 Years	26,000	6.1	20,400	4.4
75 to 84 Years	15,037	3.5	15,881	3.4
85 Years and Over	5,426	1.3	5,621	1.2
Total:	429,433	100.0	461,522	100.0

Source: U.S. Census Bureau Data.

Not only are the number of city residents under the age of 19 growing, but the number of city residents between 35 and 59 as well. In 1990 the number of city residents between 35 and 59 was 111,633 and represented 26.0% of the total population.

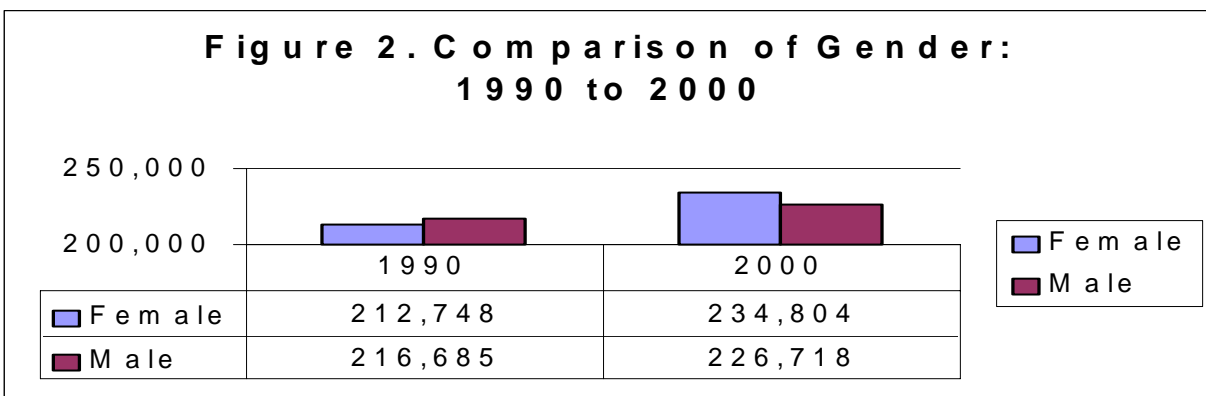


In 2000, the number of city residents between 35 and 59 was 142,944 and represented 31.0% of the total population. The figure below clearly displays the differences.

Figure 1 above also reveals that the number of city residents 60 years of age and older is steadily decreasing. The total number of city residents 60 years of age and older in 1990 was 60,233 and represented 14.2% of the total population. The total number of city residents 60 years of age and older in 2000 was 54,239 and represented 11.7% of the total population which was a decrease of 2.5% over the 1990 percentage.

4. Gender

There is also a slight growth concerning gender. The number of female residents has slightly increased since 1990. In 1990 the number of females was 212,748 and in 2000 the number was 234,804 which represents an increase of 10.4%. In 1990 the number of males was 216,685 and in 2000 the number was 226,718 which represents an increase of 4.6%. As a result, females outnumbered males in 2000 whereas males outnumbered females in 1990.



B. Income Level

One of the primary purposes of this subsection is to identify the income level of each census tract within its Community Development Impact Teams Targeted Area. The income levels used correspond to tract classifications as defined by HMDA and CRA regulations. The income levels are defined as follows:

- **Low** is when the Median Family Income Percent is <50% of the 1999 HUD estimated MSA/nonMSA Median Household Income Of \$52,100;
- **Moderate** is when the Median Family Income Percent is >50% and <80% of the 1999 HUD estimated MSA/nonMSA Median Household Income Of \$52,100;
- **Middle** is when the Median Family Income Percent is >80% and <120% of the 1999 HUD estimated MSA/nonMSA Median Household Income Of \$52,100;
- **Upper** is when the Median Family Income Percent is >120% of the 1999 HUD estimated MSA/nonMSA Median Household Income Of \$52,100;
- If the Median Family Income % is 0% then the income level is not known.

Of the nine (9) city census tracts that have an income level of Low six (6) or two-thirds of the census tracts are located within the Central District. In addition, this district has more of the city's moderate census tracts than any other district. Five (5) of the city's 12 moderate income census tracts are in this district.

Table 9. Central District.

Census Tract	Income Level	1999 HUD Estimated MSA/nonMSA Median Family Income	1999 Estimated Median Family Income	Median Family Income Percent	Percent of People Living Below Poverty Line
5722.01	Upper	\$52,100	\$68,527	131.53	4.89
5722.02	Middle	\$52,100	\$62,108	119.21	6.60
5730	Moderate	\$52,100	\$28,978	55.62	24.93
5731	Middle	\$52,100	\$42,982	80.58	13.04
5732.01	Moderate	\$52,100	\$27,332	52.46	39.71
5732.02	Low	\$52,100	\$22,075	42.37	41.79
5751	Moderate	\$52,100	\$31,390	60.25	27.95
5752	Moderate	\$52,100	\$26,165	50.22	36.19
5753	Low	\$52,100	\$23,820	45.72	42.86
5754	Low	\$52,100	\$24,675	47.36	32.91
5758	Low	\$52,100	\$23,289	44.70	32.76
5763	Low	\$52,100	\$24,362	46.76	33.39
5764	Low	\$52,100	\$23,476	45.06	38.44
5769	Moderate	\$52,100	\$29,598	56.81	25.80

Source: Federal Financial Institutions Examination Council

The Community Development Impact Teams Targeted Area immediate south of the Central District is the Downtown District. The two census tracts that border the Central District are low-income level areas.

Table 10. Downtown District.

Census Tract	Income Level	1999 HUD Estimated MSA/nonMSA Median Family Income	1999 Estimated Median Family Income	Median Family Income Percent	Percent of People Living Below Poverty Line
5759	Low	\$52,100	\$25,263	48.49	27.19
5760	Upper	\$52,100	\$101,183	194.21	6.42
5761	Middle	\$52,100	\$42,665	81.89	14.80
5762	Low	\$52,100	\$21,908	42.05	33.90

Source: Federal Financial Institutions Examination Council

The only other Community Development Impact Teams Targeted Area that has a Low income level census tract is the North District. This census tract has the lowest median family income (\$10,446) than any other census tract. The table below notes that 58.44 percent of the people living in this census tract live below the poverty line.

Table 11. North District.

Census Tract	Income Level	1999 HUD Estimated MSA/nonMSA Median Family Income	1999 Estimated Median Family Income	Median Family Income Percent	Percent of People Living Below Poverty Line
5701	Upper	\$52,100	\$66,110	126.89	8.73
5702.01	Moderate	\$52,100	\$35,913	68.93	18.16
5702.02	Middle	\$52,100	\$47,489	91.15	18.90
5703.01	Middle	\$52,100	\$44,155	84.75	13.56
5703.02	Middle	\$52,100	\$45,702	87.72	10.77
5704	Middle	\$52,100	\$48,437	92.97	16.65
5705	Middle	\$52,100	\$48,354	92.81	14.73
5706	Moderate	\$52,100	\$40,659	78.04	13.47
5715.01	Middle	\$52,100	\$57,195	109.78	7.92
5715.02	Middle	\$52,100	\$58,623	112.52	7.67
5716	Low	\$52,100	\$10,446	20.05	58.44
5717	Middle	\$52,100	\$43,602	83.69	14.06
5718	Upper	\$52,100	\$113,922	218.66	7.50
5719	Upper	\$52,100	\$71,341	136.93	4.39
5721	Upper	\$52,100	\$81,086	155.60	12.79
5724	Middle	\$52,100	\$62,499	119.96	7.07

Source: Federal Financial Institutions Examination Council

The West District is made up of two distinct areas. The upper area contains seven (7) census tracts of which four (4) have a Moderate income level. The lower area is sparsely populated and has just one census tract for which income level is known. The income level for this census tract is High.

Table 12. West District.

Census Tract	Income Level	1999 HUD Estimated MSA/nonMSA Median Family Income	1999 Estimated Median Family Income	Median Family Income Percent	Percent of People Living Below Poverty Line
West-Upper:		\$52,100			
5723	Middle	\$52,100	\$43,644	83.77	18.45
5725	Moderate	\$52,100	\$32,651	62.67	19.29
5726	Middle	\$52,100	\$51,902	99.62	7.27
5727	Middle	\$52,100	\$52,230	100.25	11.49
5728	Moderate	\$52,100	\$27,373	52.54	17.48
5729	Moderate	\$52,100	\$34,350	65.93	22.07
5755	Moderate	\$52,100	\$28,837	55.35	57.28
West-Lower:					
5756	Upper	\$52,100	\$66,735	128.09	0.00
5756.99	Unknown	\$52,100	\$0.00	0.00	38.46
5757	Unknown	\$52,100	\$0.00	0.00	0.00
5757.99	Unknown	\$52,100	\$0.00	0.00	18.92

Source: Federal Financial Institutions Examination Council

The one Community Development Impact Teams Targeted Area that has the highest levels of medium family income is the Airport/East District. The table below discloses that there are no low-income level census tracts and only one moderate-income level census tract.

Table 13. Airport/East District.

Census Tract	Income Level	1999 HUD Estimated MSA/nonMSA Median Family Income	1999 Estimated Median Family Income	Median Family Income Percent	Percent of People Living Below Poverty Line
5712	Upper	\$52,100	\$66,261	127.18	5.77
5735	Unknown	\$52,100	\$0.00	0.00	0.00
5736	Upper	\$52,100	\$67,923	130.37	3.73
5737	Upper	\$52,100	\$65,709	126.12	5.56
5738	Upper	\$52,100	\$73,122	140.35	1.93
5739.01	Middle	\$52,100	\$61,131	117.68	0.00
5739.02	Upper	\$52,100	\$111,431	213.88	1.40
5739.03		\$52,100			
5740	Upper	\$52,100	\$74,717	143.41	2.76
5741	Upper	\$52,100	\$66,428	127.50	2.73
5742.01	Upper	\$52,100	\$67,798	130.13	4.32
5742.02	Upper	\$52,100	\$66,526	127.69	6.50
5743	Upper	\$52,100	\$70,919	136.12	3.23
5744	Upper	\$52,100	\$73,596	141.26	1.61
5745	Upper	\$52,100	\$77,603	148.95	5.43
5746.01	Unknown	\$52,100	\$0.00	0.00	0.00
5746.02	Upper	\$52,100	\$116,266	223.16	0.83
5747	Upper	\$52,100	\$66,318	127.29	0.00
5748	Upper	\$52,100	\$105,893	203.25	3.59
5749.01	Upper	\$52,100	\$66,969	128.54	6.11

5749.02	Middle	\$52,100	\$60,816	116.73	13.87
5750.01	Middle	\$52,100	\$52,866	101.47	6.22
5750.02	Middle	\$52,100	\$46,984	90.18	11.09
5765	Moderate	\$52,100	\$27,920	53.59	21.11
5766	Middle	\$52,100	\$46,155	88.59	12.02
5767	Upper	\$52,100	\$67,068	128.73	8.23
5768	Middle	\$52,100	\$41,753	80.14	12.18
5770	Middle	\$52,100	\$56,237	107.94	11.06
5771	Upper	\$52,100	\$68,808	132.07	8.42
5772	Upper	\$52,100	\$70,533	135.38	6.30
5773	Upper	\$52,100	\$73,461	141.00	6.00
5774	Upper	\$52,100	\$82,084	157.55	3.76
5775.01	Upper	\$52,100	\$108,727	208.69	4.58
5775.02	Upper	\$52,100	\$97,203	186.57	3.72
5776.01	Upper	\$52,100	\$76,592	147.01	5.04
5776.02	Upper	\$52,100	\$90,044	172.83	3.90
5776.03	Upper	\$52,100	\$114,714	220.18	3.89
5776.99	Unknown	\$52,100	\$0.00	0.00	0.00

Source: Federal Financial Institutions Examination Council

C. Housing Profile

The primary purpose of this subsection is to identify housing trends among the city's general population. Trends are made within the following two categories: 1) household type and 2) household tenure. In addition, patterns of housing segregation are noted.

1. Household Type

According to U.S. Census 2000 data, there are 163,088 households that make up the city's total population of 461,522. The following table lists various types of households and compares the total numbers of these households in 2000 with the total numbers in 1990.

Table 14. Comparison of Types of Households: 1990 and 2000.

Type of Household	1990		2000		Variance	
	#	%	#	%	#	%
Female-Headed	14,458	9.0	26,319	16.1	11,861	7.1
Households with Individuals Under 18 Years	52,706	32.9	57,080	35.0	4,374	2.1
Households with Individuals 65 Years & Over	13,766	8.6	12,129	7.4	-1,637	1.2
Households 65 Years & Over	33,815	21.1	29,901	18.3	-3,914	2.9
In Group Quarters - Institutionalized	4,026	2.5	3,378	0.7	-648	1.8
In Group Quarters - Noninstitutionalized	10,191	6.4	6,803	1.5	-3,388	4.9
Total Households:	159,975		163,088			

Source: U.S. Census Bureau Data.

Female-headed households was selected because of the large number of female-headed households who have sought help concerning potential discrimination inquiries or general housing concerns (see section III). The number of female-headed

households nearly doubled between 1990 and 2000. In 1990 female-headed households made up 9.0% of all types of households and increased to 16.1% in 2000.

Households with children, seniors, and group quarters were chosen because persons living within these types of households are protected by fair housing and civil rights legislation. Federal and state fair housing and civil rights legislation protect (among other classes of persons) households with children, persons with disabilities, and seniors.

Federal and state fair housing and civil rights legislation protect households with children under the protected class-familial status. This includes any household with a child under 18 years of age. The number of households with individuals under 18 years of age has increased during the past decade. There were more than four thousand households with children under the age of 18 in 2000 than in 1990. These households now make up 35% of all household types.

Persons with disabilities are also protected by law (e.g. Fair Housing Act as amended in 1988; California Assembly Bill 2244). The data in table 16 under "In Group Quarters - Institutionalized and "In Group Quarters - Noninstitutionalized contain persons with disabilities. The Census Bureau recognizes two general categories of people in group quarters: 1) the institutionalized population which includes people under formally authorized, supervised care or custody in institutions at the time of enumeration (such as correctional institutions, nursing homes, and juvenile institutions) and 2) the noninstitutionalized population which includes all people who live in group quarters other than institutions (such as college dormitories, military quarters, and group homes). Both categories contain households (an individual) with disabilities.

Seniors are also protected by law (e.g. California Assembly Bill 2244). Though the number of seniors have decreased in the past decade, a significant number of households have individuals 65 years of age or over (12,129 in 2000) or consist of households with member(s) 65 years of age or more (29,901 in 2000).

Another significant household type in this community is same-sex households. Same sex households enjoy protected class status in California through provisions within the Unruh Act. Issues of housing discrimination based on sexual orientation are treated with the same enforcement effort at all other protected classes in California. Table 15 reveals that Long Beach has a higher percentage of reported same-sex households than all of the other large cities in Los Angeles County including Los Angeles County. Long Beach's percentage of reported same-sex households is 35.7% higher than the City of Los Angeles and 42.9% higher than Los Angeles County.

Table 15. Comparison of Same-Sex Households by Region

Region	Total Households	# of Male Householder & Male Partner	# of Female Householder & Female Partner	Total	
				Number	% of Total Households
Long Beach	163,088	1,289	977	2,266	1.4
Los Angeles	1,275,412	7,427	4,622	12,049	0.9
Los Angeles County	3,133,774	14,468	10,705	25,173	0.8
Pasadena	51,844	266	168	434	0.8
Pomona	37,855	145	148	293	0.8
Glendale	71,805	268	194	462	0.6
Torrance	54,542	89	126	215	0.4

The city's same-sex household population lives clustered together. Table 16 lists those census tracts that have the largest number of same-sex households. These nine census tracts all border one another and are located along the southern coastline of the city.

Table 16. Concentration of Same-Sex Households

Census Tract	Male and Male	Female and Female	Total
5765	75	42	117
5766	117	48	165
5767	53	31	84
5768	72	48	120
5770	21	37	58
5771	56	37	93
5772	48	19	67
5773	36	16	52
5776.03	41	28	79

2. Housing Tenure

Table 15. Comparison of Housing Tenure: 1990 and 2000

Housing Tenure	1990		2000	
	#	%	#	%
Renter-Occupied Units	93,858	59.0	96,160	59.0
Owner-Occupied Units	65,117	41.0	66,928	41.0
Total:	158,975	100.0	163,088	100.0

While the total number of renter-occupied housing units and owner-occupied housing units changed between 1990 and 2000, the overall percentage of both types of housing tenure did not. In other words, the total number of renter occupied units increased from 93,858 units to 96,160 units representing an increase on 2.4 percent. The total number of renter occupied units for each time period, however, represented 41% of all occupied units. The same is true concerning owner-occupied units. The total number of owner-occupied units increased by 2.8% between 1990 and 2000 and, as in 1990, made up 59% of all occupied housing units.

3. Housing Segregation

Table 16 below reveals that of the three ethnic groups listed, only Hispanics or Latinos represent more than 50% of the total population for more than one census tract. There are six census tracts in which Hispanics or Latinos represent between 50% and 60% of the total population and two census tracts in which Hispanics or Latinos represent more than 60% of the total population.

Table 16. Housing Segregation Among Hispanics or Latinos, Blacks or African Americans, and Asians.

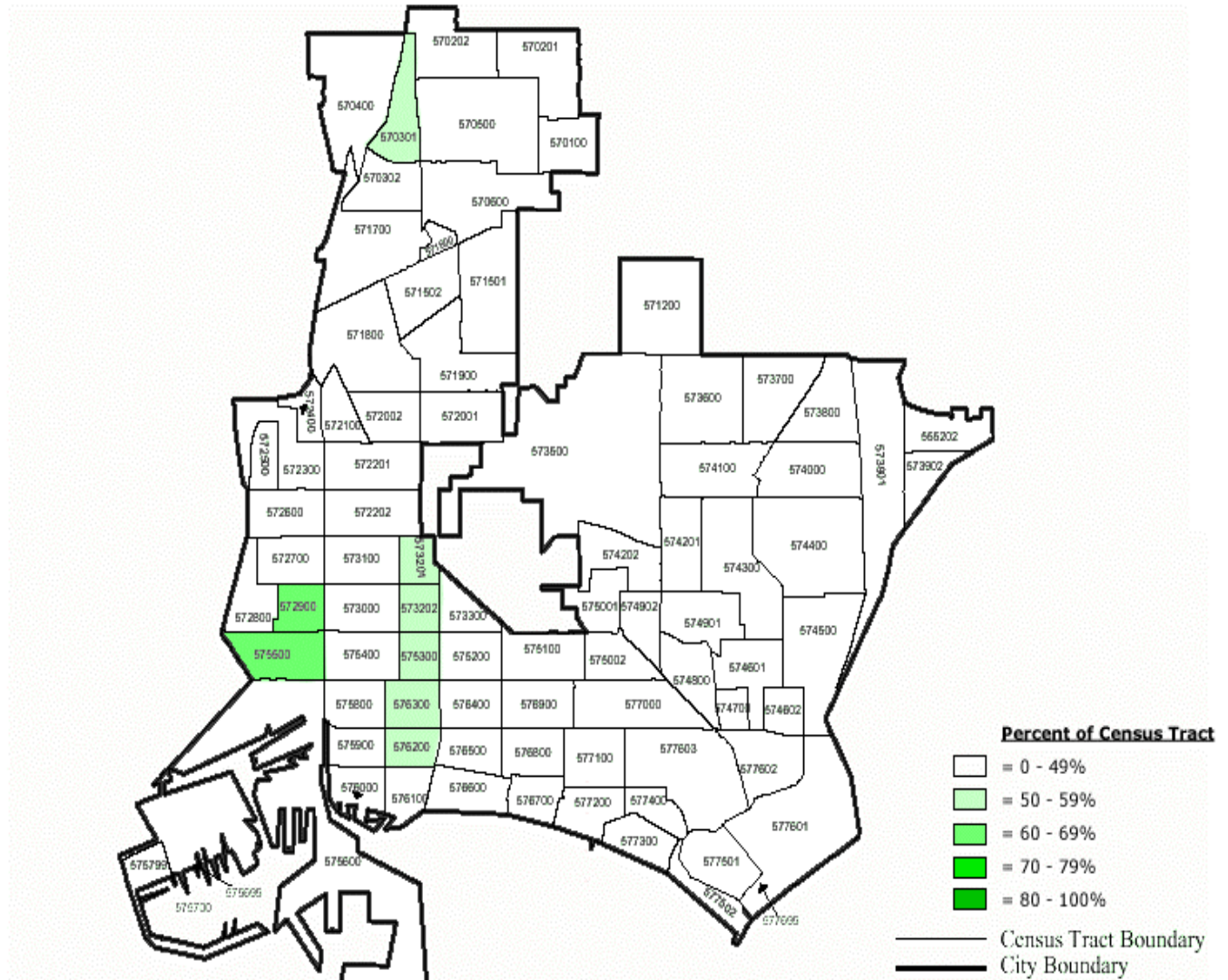
Hispanics or Latinos:		
Census Tract	Number	Percentage
5703.01	3,542	52.2
5729	3,299	64.5
5732.01	2,941	58.2
5732.02	3,026	53.1
5753	2,711	54.4
5755	160	63.5
5762	2,956	52.3
5763	4,938	55.4
Blacks or African American:		
5716	1,103	55.5
Asians:		
5727	2,610	47.5

African Americans represent a majority of the population in only one census tract. Census tract 5716 located in the North District also happens to be the census tract with the lowest median family income level in the city (\$10,446), more than 100% below the family income level in the census tract with the second lowest median income (\$21,908). Almost three out of every five (58.4%) households in this census tract live below the poverty level.

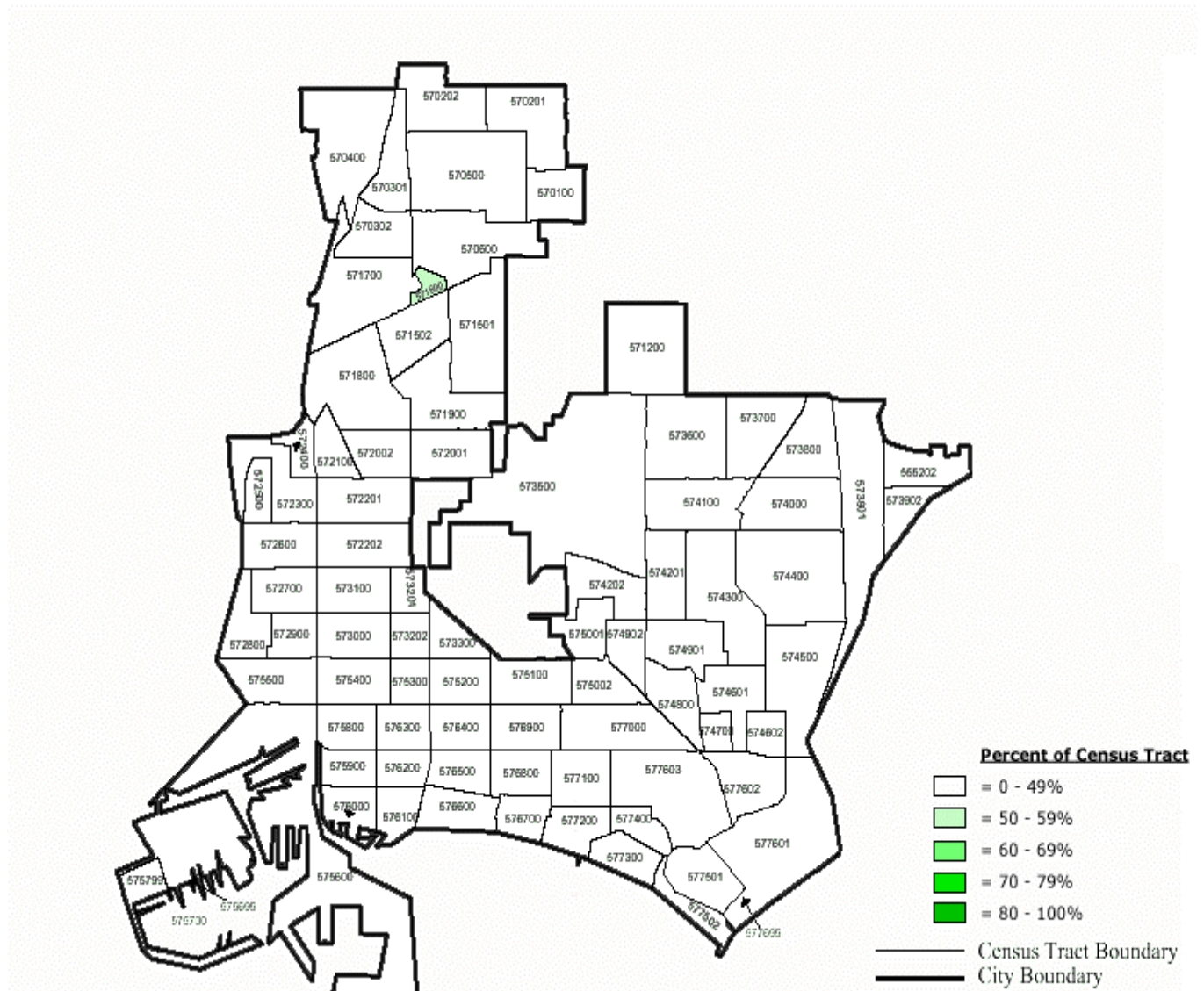
Asian American households do not represent a majority in any census tract in the City. The largest concentration of Asian American households lives in census tract 5727 in the West District of the city.

The two census tracts in which Hispanics or Latinos represent more than 60% of the total population border each other within the heart of the West Community Development Impact Teams Targeted Area. A comparison of ethnicity between 1990 and 2000 for Census tract 5755, however, does not reveal a segregation trend. Hispanics or Latinos represented 69.3% of the total population in 1990. In 2000, the percentage of Hispanics or Latinos did not increase but decreased to 63.5% of the total population.

Concentration of Hispanic/Latino Households by Census Tract



Concentration of Black/African American Households by Census Tract



Concentration of Asian American Households by Census Tract

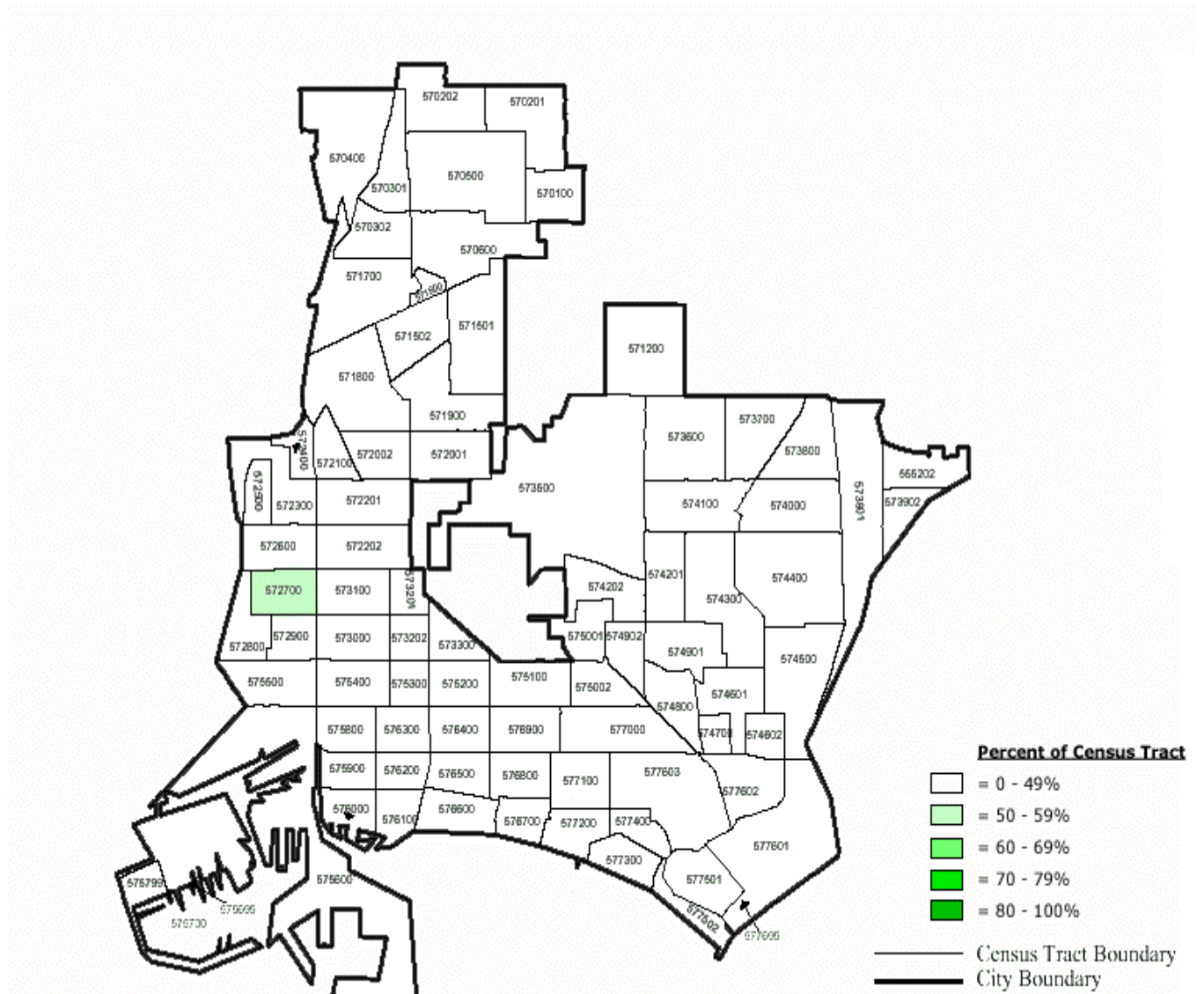


Table 17. Census Tract 5755

Census Tract	1990		2000		Variance	
5755	#	%	#	%	#	%
American Indian and Alaska Native	0	0.0%	3	1.2%	3	1.2%
Asian	110	21.7%	7	2.8%	-103	-18.9%
Black or African American	0	0.0%	19	7.5%	19	7.5%
Hispanic or Latino (of any race)	352	69.3%	160	63.5%	-192	-5.8%
Native Hawaiian and Other Pacific Islander	0	0.0%	2	0.8%	2	0.8%
White	46	9.1%	55	21.8%	9	12.8%
Some other race	0	0.0%	4	1.6%	4	1.6%
Two or more races*	-	-	2	0.8%	-	-
Total:	508	100%	252	100%	-258	-50.4%

A segregation trend can be noted in census tract 5729. In 1990, Hispanics or Latinos represented 55.3% of the total population. In 2000 the percentage of Hispanics or Latinos increased to 64.5% and the percentage of Blacks or African Americans decreased from 18.5% in 1990 to 12.7% in 2000. Also, the percentage of Whites decreased from 7.9% in 1990 to 2.8% in 2000.

Table 18. Census Tract 5729

Census Tract	1990		2000		Variance	
5729	#	%	#	%	#	%
American Indian and Alaska Native	29	0.6%	31	0.6%	2	0.1%
Asian	782	14.9%	794	15.5%	12	0.6%
Black or African American	968	18.5%	649	12.7%	-319	-5.8%
Hispanic or Latino (of any race)	2893	55.3%	3,299	64.5%	406	9.2%
Native Hawaiian and Other Pacific Islander	149	2.8%	81	1.6%	-68	-1.3%
White	411	7.9%	145	2.8%	-266	-5.0%
Some other race	0	0.0%	14	0.3%	14	0.3%
Two or more races*	-	-	100	2.0%	-	-
Total:	5232	100%	5,113	100%	-219	-2.3%

Table 19 reveals that Whites represented the majority (50% or more) of the total population in 36 census tracts in 2000. Within nearly half (17) of these census tracts Whites represented 75% or more of the total population. In five of the 17 census tracts Whites represented 80% or more of the total population (see shaded area within the table).

Segregation trends can be noted. Thirty (30) of the census tracts are located within the eastern part of the city--the Airport/East Community Development Impact Teams Targeted Area. This means that of the 33 census tracts that make up this area, 30 census tracts or 91.9% of the census tracts have a majority of Whites.

Table 19. Housing Segregation Trends Among Whites

Census Tract	Number	Percentage
5700.03	2,459	57.7
5712	5,169	66.5
5718	2,090	67.0
5719	3,126	59.0
5720.01	3,022	59.5
5736	4,577	76.9
5737	3,391	76.2
5738	3,225	76.1
5739.02	1,691	75.4
5740	3,880	75.6
5741	3,779	77.2
5742.01	2,092	69.7
5742.02	1,457	69.3
5743	4,306	76.9
5744	3,909	76.6
5745	4,676	73.9
5746.01	864	50.4
5746.02	920	75.2
5747	217	51.4
5748	2,110	73.6
5749.01	2,746	77.6
5749.02	2,406	50.9
5750.01	1,648	53.3
5750.02	2,482	54.6
5761	1,641	61.5
5767	2,656	69.1
5770	3,557	50.4
5771	4,382	67.2
5772	4,190	76.9
5773	4,373	79.6
5774	2,549	82.4
5775.01	3,000	88.8
5775.02	1,343	89.2
5776.01	1,030	85.8
5776.02	2,708	79.9
5776.03	6,273	80.5
36	103,944	68.0

A closer look at these census tracts does reveal that there was some shift in concentration between 1990 and 2000.

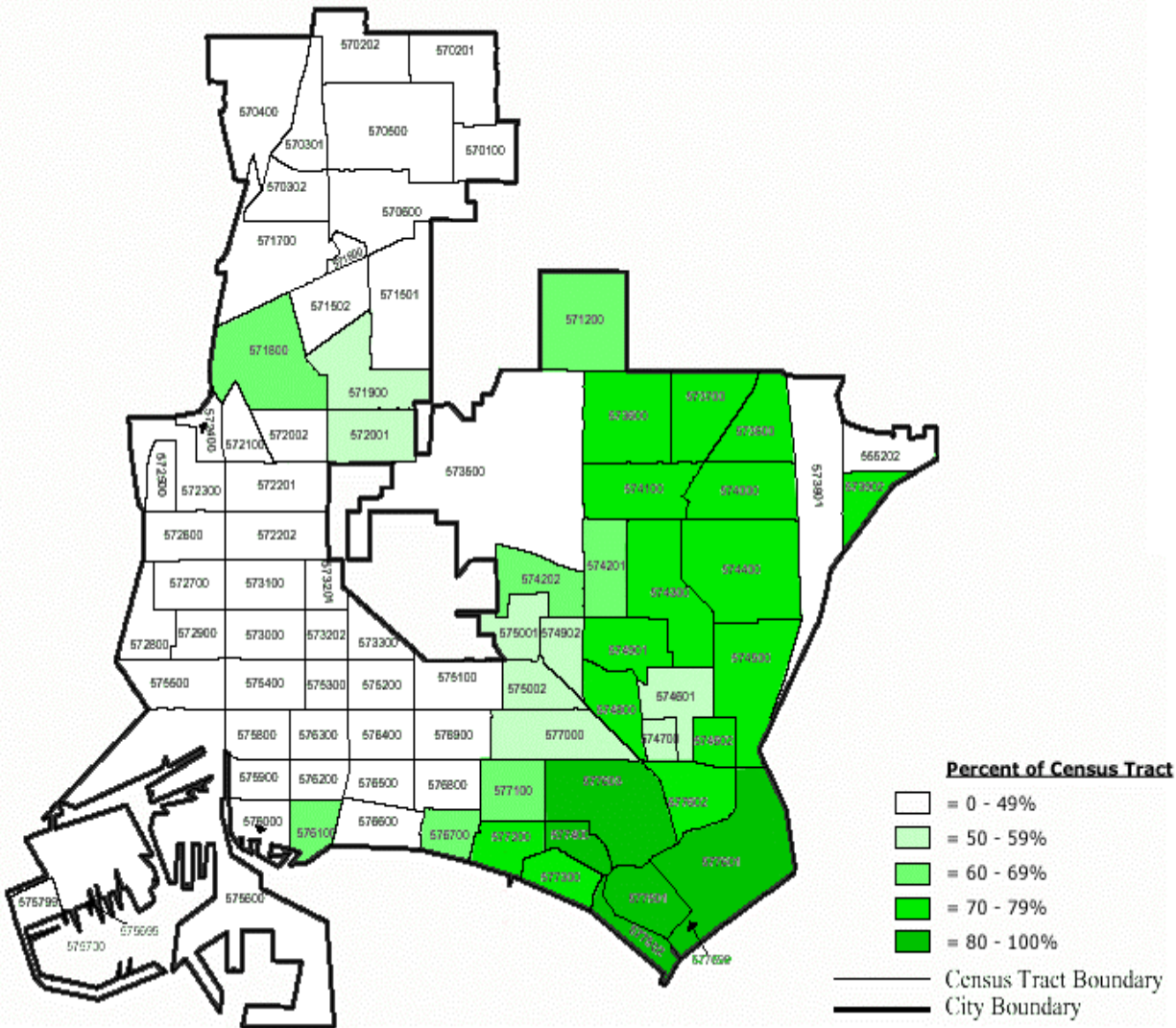


Table 20. Housing Segregation Trends Among Whites Within Selected Census Tracts

Census Tract	1990		2000		Variance	
	#	%	#	%	#	%
5774	2,958	91.0	2,549	82.4	-409	-8.6
5775.01	3,388	94.5	3,000	88.8	-388	-5.7
5775.02	1,412	92.0	1,343	89.2	-69	-2.8
5776.01	1,543	82.1	1,030	85.8	-513	+3.7
5776.02	2,998	89.9	2,708	79.9	-290	-10.0
5776.03	6,654	87.9	6,273	80.5	-381	-7.4
	18,953*	89.6**	16,903*	84.4**	-342**	-4.1**

Table 20 lists the five (5) census tracts that have a percentage of Whites that is 80% or more. In addition, the table lists census tract 5776.02 that has a percentage of White residents of 79.9%. All six of these census tracts border one another within the southeastern part of the city.

The table discloses that Whites continue to make up a significant majority within the area. Comparing the numbers reveals that the total number of Whites and the total percent of Whites did decrease between 1990 and 2000. The total number of Whites decreased by 342 residents. More significantly, the total percentage of Whites decreased from 89.6% in 1990 to 84.4% in 2000.

Despite having a diverse ethnic population citywide, there is a clear pattern of segregation among Whites living in the City. Over two-thirds of the White population in Long Beach (68%) live in census tracts where Whites make up more than fifty percent of the residents. Thirty of the thirty-six census tracts where this is the case lie within the eastern part of the city and seventeen of those have White populations of more than 75%.

There is a wide range of reasons why these segregation patterns could exist. The census tracts with the highest level of segregation are also those with the highest median income levels in the city, thus, some of the patterns identified could be due to economic factors. In addition, housing patterns in neighborhoods often have historical roots that can take decades to transcend. However, in a city with as diverse a population as Long Beach, not to mention the diversity within the entire Los Angeles/Long Beach Metropolitan Region, it seems highly unusually that the level of segregation in the eastern part of the city would be so widespread. We suggest the City take a closer look at this issue to ensure that equal housing opportunities are available for all populations desiring to live in the eastern part of the city.

III. Evaluation of Current Fair Housing Profile

All entitlement communities are required by HUD to have a reactive and pro-active fair housing program with specific actions and procedures that will have significant impact on preventing, reducing and eliminating housing discrimination and barriers to equal housing choice for all.

Since 1969, The City of Long Beach has provided funding to the Fair Housing Foundation (FHF) to assist in the effort to affirmatively further fair housing opportunities in this community. The Fair Housing Foundation was founded in Long Beach in 1964 by a diverse group of citizens who organized against Proposition 14, a state ballot initiative seeking to nullify California's fair housing laws. For over 35 years, FHF has operated as a private, nonprofit, nonpartisan educational agency dedicated to promoting the enforcement of fair housing laws and encouraging an atmosphere of open housing. FHF assists residents, housing professional and community service providers in Long Beach, and other communities throughout Los Angeles County, with fair housing and general housing concerns through education, enforcement activities, counseling services and outreach programs from its Long Beach headquarters.

Specifically, The City of Long Beach contracts with FHF to provide fair housing services that includes:

- General fair housing information and counseling;
- Innovative programs to eliminate housing discrimination;
- In-depth testing, investigation and processing of housing discrimination complaints;
- Audits of housing practices;
- Comprehensive education and outreach services;
- General housing counseling, screening and referral services;
- Tester and other volunteer training;
- Promoting public interest in eliminating housing violations through the media.

A. Fair Housing Charges, Suits or Findings Filed Against the City of Long Beach

HUD has issued no charges of discrimination and made no findings of non-compliance against the City of Long Beach. The Department of Justice has not filed any suits nor taken any judicial action against the City related to fair housing.

B. Summary of Housing Discrimination Complaints Filed with the Fair Housing Foundation

Under the federal Fair Housing Act, complaints of alleged housing discrimination could be filed on the basis of race, color, religion, national origin, sex, familial status and handicap. State of California law provides additional protections against housing

discrimination based on marital status, ancestry, age and arbitrary reasons that can include sexual orientation, source of income and other arbitrary characteristics.

The Fair Housing Foundation has received and processed allegations of housing discrimination in the City of Long Beach for over thirty years. For this study, we have reviewed Housing Discrimination Complaint records kept by FHF for the most recent five-year period, April of 1996 – March of 2001.

1) Discrimination Inquiries

FHF staff members conduct an initial intake screening with all individuals who contact the agency to determine whether their complaint is a general housing concern (landlord/tenant matter, etc.) or a potential discrimination issue. If the issues presented represent a possible fair housing violation, the “inquiry” is turned over to the discrimination department for further review. Discrimination department staff then conducts a more thorough intake interview to determine whether further investigation of the matter is warranted.

During the last five years, FHF received housing discrimination inquiries from 1,289 individuals in the City of Long Beach alleging 1,842 violations of fair housing laws. Some complaints from individuals involve multiple allegations of fair housing violations.

Table 1 below presents the number and percentage of clients contacting FHF with allegations of housing discrimination by ethnicity.

Table 1: Discrimination Complainants by Ethnicity

Ethnicity	# of clients	% of total clients	% of population
African American	581	45.1	14.5
Caucasian	435	33.7	33.1
Hispanic/Latino	198	15.4	35.8
Asian-Pacific Islander	36	2.8	13.1
Other	39	3.0	3.5
Total	1289	100	100

Almost half (45.1%) of the clients presenting complaints alleging housing discrimination in Long Beach during the last five years have been African American. This percentage represents more than three times the percent of the total population that African Americans (14.5%) represent in Long Beach. Such an overwhelmingly disproportionate percentage of complaints by one ethnic population present some serious concerns about community-wide housing practices.

On the other hand, only one in six complainants were Latino (15.4%) despite a population of over 35% in Long Beach. Discrimination complaints from Asian-Pacific Islanders were virtually non-existent (2.8%) despite the fact that this population represents 13% of the community residents including a large low-moderate income Cambodian population. While these numbers could suggest that these populations are not experiencing a high rate of housing discrimination in Long Beach, they could also

suggest that when individuals within these populations do experience differential treatment in the housing market it is not being reported. One-third (33.7%) of the people alleging housing discrimination were Caucasians, which virtually matches their percentage of the population (33.1%).

Table 2 below presents the profile of complainants by income level. Not surprisingly, a large majority of individuals contacting FHF alleging housing discrimination were low income. More than three out of every four people (76.7%) contacting FHF to file a complaint of fair housing violations were from low or very-low income households.

Table 2: Discrimination Complainants by Income

Income	# of clients	% of total clients	% of pop.
Low-Income	989	76.7	47.3
Moderate Income	255	19.8	20.3
High Income	45	3.5	32.4

Probably the most striking information revealed from our statistical review of the client data was the fact that almost half (49.3%) of the individuals presenting complaints of housing discrimination were from single female-headed households.

Table 3: Discrimination Complainants by Household Status

Household Status	# of clients	% of clients	% of households
Female Headed Household	636	49.3	16.1%
Other Households	653	50.7	83.9%

Less than one out of every six households (16%) in Long Beach is headed by a female and only one in ten (10%) is headed by a single female with children. Yet, female-headed households represent almost half of the clients (49.3%) who contacted FHF alleging they had experienced housing discrimination over the last five years, more than three times their percentage of the Long Beach population. This is a phenomenon that requires much more in-depth study to determine the nature and extent of the concerns faced by female-headed households.

2) Discrimination Cases Opened

If the facts presented by a complainant during the discrimination intake interview suggest a potential fair housing violation has occurred, FHF staff will open a “case” and conduct an investigation of the allegation. Such an investigation could include on-site testing, telephone testing, property surveys, witness interviews or document review depending on the circumstances in the particular case.

Based on an initial review of the information provided by the clients alleging housing discrimination over the last five years, FHF discrimination department opened cases and conducted investigations on 539 complaints of fair housing violations. These complaints alleged housing discrimination on the following basis:

Table 4: Basis of Complaint in Discrimination Cases Opened

Basis of Complaint	1996 – 1997	1997 – 1998	1998 – 1999	1999 - 2000	2000 – 2001	Total
Race	52	43	34	42	18	189
Familial Status	28	19	26	21	13	107
National Origin	12	14	4	4	5	39
Sex	1	1	4	0	0	6
Physical Disability	8	13	18	8	12	59
Sexual Orientation	10	4	5	6	3	28
Marital Status	3	5	7	0	0	15
Age	6	10	15	2	1	34
Harassment	4	2	2	0	0	8
Religion	2	1	2	1	0	6
Mental Disability	0	3	1	5	2	11
Ancestry	0	0	0	0	0	0
Source of Income	*	*	*	2	4	6
Arbitrary	2	11	7	5	2	27
Total	128	126	125	100	60	539

* prior to 1999-2000 source of income was included in Arbitrary

Discrimination on the basis of race remains the most prevalent fair housing allegation in Long Beach with over one-third (35%) of the cases investigated on that basis. Beyond the obvious issue of discrimination in housing based on race, the second and third highest number of complaints were filed on the basis of familial status and disability respectively, the two most recent additions to protected class status under federal fair housing laws. Almost one of every five cases opened (19.9%) were on the basis of familial status while complaints of discrimination on the basis of physical or mental disability represented over one-eighth (13%) of those investigated.

The Fair Housing Amendment Act of 1988 expanded coverage to prohibit discriminatory housing practices based on “handicap” and familial status. Yet, despite being on the books for over thirteen years, many housing consumers and housing providers remain ignorant to the nature and scope of the protections provided to families with children and people with disabilities under state and federal fair housing laws. Despite the current volume of complaints, national trends and research studies suggest a high probability that both of these concerns are under-reported in Long Beach and elsewhere. We suggest that the City and the Fair Housing Foundation expand education and outreach efforts to heighten public awareness of fair housing issues as they relate to families with children and people with disabilities.

C. Review of General Housing Concerns Reported to the Fair Housing Foundation

In addition to reviewing complaints of housing discrimination in the City of Long Beach, FHF also assists residents, housing providers and all others with general housing concerns, particularly tenant/landlord matters. In fact, more than 90% of the people who contact FHF are seeking assistance with such general housing concerns as evictions, rental terms and conditions, habitability issues, etc. FHF staff provides counseling, mediation, information and referral and other appropriate assistance with these matters to in-place tenants, property owners and managers, home seekers and others. Additionally, FHF provides educational workshops to tenants and housing providers, including Certified Management Trainings, on fair housing laws, tenant/landlord rights and responsibilities, and others housing issues.

All initial contact with FHF begins with a client intake form completed by FHF counselors who assess the nature of the client's concern. Clients presenting concerns with general housing matters are provided with counseling and other appropriate assistance while clients presenting concerns with potential housing discrimination are referred to the discrimination department. Housing Counselors work closely with the Discrimination Department staff to help distinguish between general housing concerns and possible violations of fair housing laws.

While most of the general housing concerns are not directly related to discrimination issues, some issues presented can reveal patterns that may suggest potential fair housing concerns. Many of the calls received by Fair Housing agencies in general come from low income and protected class individuals and families. Oftentimes a disproportionate number of these calls are related to concerns about substandard conditions, displacement, harassment, or failure to provide basic services.

Over the most recent five-year period, FHF has provided counseling on general housing concerns for over 17,000 Long Beach residents, housing providers and others. In order to provide an in-depth profile of the people seeking assistance and the issues of their concern, we examined FHF records from January 1, 1998 - April 10, 2001 for this study.

The table below reveals that during this period FHF received 11,760 requests for assistance with housing issues.

Table 5. Total Number of Clients By Year

Year	# of Complaints
1998	2,998
1999	3,556
2000	4,005
January 1 - April 10 2001	1,201
Total:	11,760

The number of requests for assistance has consistently increased over the last three years, increasing 18.6% from 1998 to 1999, 12.6% from 1999 to 2000. If requests continue at the current pace in 2001, there will be an increase from 2000 to 2001 of around 19%.

Table 6 below identifies the number of people seeking assistance from FHF with all housing concerns by ethnicity.

Table 6. Number of Clients by Ethnicity

Ethnicity	# of clients	% of clients	% of population
African-American	4,316	36.7	14.5
White/Caucasian	4,028	34.2	33.1
Hispanic/Latino	2,797	23.8	35.8
Asian/Pacific	230	2.0	13.1
Other	389	3.3	3.5
Total	11,760	100	100

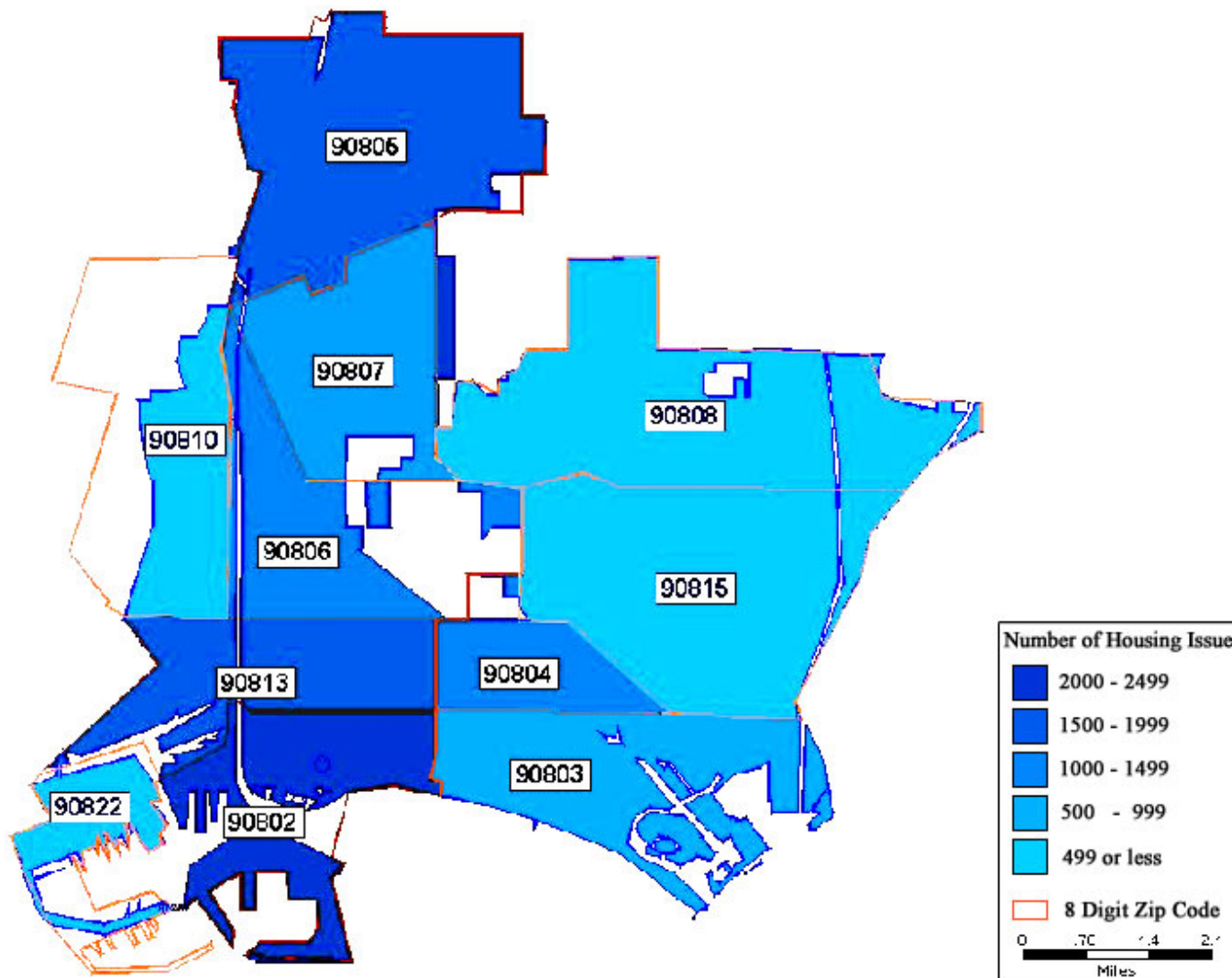
More than one out of every three clients (36.7%) seeking assistance from FHF were African American. This stands in stark contrast to the fact that African Americans represent less than one of every six (14.5%) Long Beach residents. On the other hand, less than one of every four (23.8%) people seeking assistance with housing concerns were Latino, despite the fact that they represent more than one-third (35.8%) of the City's residents. Asian American residents of Long Beach are significantly underrepresented amongst those seeking housing assistance (2% clients compared to 13.1% residents).

The next table presents a geographic breakdown by zip code of the number of individuals in Long Beach seeking assistance with housing concerns over the last four years.

Table 7. Total Number of Clients by Zip Code

Zip Code	Number	Percent
90802	2,478	21.1
90803	725	6.2
90804	1,469	12.5
90805	1,869	15.9
90806	1,199	10.2
90807	697	5.9
90808	188	1.6
90810	364	3.1
90813	1,775	15.1
90815	261	2.2
90822	0	0.0
Other Zip Codes	695	5.9
No Zip Code Recorded	40	0.3
Total:	11,760	100.0

City of Long Beach Zip Code Map By Number of Housing Issues



Three out of four (74.8%) FHF clients in the City of Long Beach reside in five of the eleven zip codes within the City. The table that follows shows five zip codes with the highest concentration of broken out by the ethnicity and household status of the clients.

Table 8. Number of Clients by Zip Code by Ethnicity and Household Status

Type of Household	90802		90804		90805		90806		90813	
	#	%	#	%	#	%	#	%	#	%
Asian	34	0.1	45	3.1	26	1.4	23	1.9	24	1.4
Black or African American	789	31.8	542	36.9	995	53.2	599	50.0	676	38.1
Hispanic or Latino	466	18.8	300	20.4	416	22.3	345	28.8	701	39.5
White	1,106	44.6	537	36.6	384	20.5	163	13.6	338	19.0
	83	4.7	45	3.0	48	2.6	69	5.7	36	2.0
Total Number of Households	2,478	100.0	1,469	100.0	1,869	100.0	1,199	100.0	1,775	100.0
Female-Headed Household	1,112	44.9	717	48.8	1,034	55.3	628	52.4	835	47.0
Total Number of Households	2,478	100.0	1,469	100.0	1,869	100.0	1,199	100.0	1,775	100.0

African Americans represent at least half of the clients in two of the five zip codes, 90805 (53.2%) and 90806 (50%). Caucasians represent the predominate percentage of clients in zip code 90802 (44.6%). In the other two zip codes, 90805 and 90813, African Americans and Caucasians each represent more than one-third of the clients and combine for more than three of every four clients in these two zip codes (75.5%).

The overwhelming majority of people seeking assistance from FHF are in-place rental tenants (92%) with most of the rest being property owners (2.3%), property managers (1.9%), and rental home seekers (1.6%).

Table 9: Number of Clients by Type

Type of Client	# of clients	% of clients
In-place Tenant	10,821	92%
Property Owner	273	2.3%
Other	227	1.9%
Property Manager	220	1.9%
Rental Home seeker	188	1.6%
Management Company	12	.10%
Realtor	8	.06%
Homebuyer	7	.05%
Former Tenant	4	.008%
Total	11,760	

1) Housing Concerns Based on Discrimination

As mentioned previously, all individuals who contact FHF for assistance go through an initial intake to determine the nature of their concern. The following table presents the number of clients who contacted FHF during the last three plus years with a housing concern based on a discrimination issue by the type of issues they presented.

Table 10: Housing Concerns based on Discrimination Issues

Type of Issue	# of clients	% of clients
Race	273	32.2
Arbitrary	212	25.1
Familial Status	115	13.6
Physical Disability	101	11.9
Sexual Orientation	36	4.3
Age	29	3.4
National Origin	21	2.5
Harassment	16	1.9
Mental Disability	12	1.4
Gender	11	1.3
Marital Status	9	1.1
Religion	5	.60
Color	3	.35
Source of Income	3	.35
Total	846	100%

Of the 11,760 clients who contacted FHF during this time period, 846 (7.2%) were seeking assistance with housing discrimination issues. The ratio of housing discrimination complaints to general housing concerns that this percentage represents is fairly standard among fair housing service providers.

The following tables, breaks out each ethnic group and identifies the type of discrimination issues initially presented by the clients.

Table 11. African American Clients Alleging Discrimination

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Race	175	50.7	64.1
Familial Status	35	10.2	30.4
Arbitrary	69	20	32.5
All other issues	66	19.1	
Total	345	100	40.8

African Americans represented more than forty-percent (40.8%) of the clients contacting FHF with initial allegations of housing discrimination, more than two times their percentage of the general population. More than half (50.7%) of the discrimination allegations were on the basis of race and African Americans represented almost two-thirds of all clients alleging racial discrimination.

In contrast, Latinos represented a small percentage of clients initially alleging housing discrimination (17.4%), less than half of their general population representation (35.8%). Almost two-third of their allegations (62.6%) were on the basis of issues other than race and familial status.

Table 12. Hispanic/Latino Clients Alleging Discrimination

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Race	28	19	10.25
Familial Status	27	18.4	23.5
Arbitrary	46	31.3	21.7
All other issues	46	31.3	
Total	147	100	17.4

The number of Caucasian clients presenting allegations of housing discrimination was relatively consistent with their representation within the community (36.4% of clients, 33.1% of population).

Table 13. White/Caucasian Clients Alleging Discrimination

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Race	52	16.9	19.0
Familial Status	49	15.9	42.6
Arbitrary	86	27.9	40.6
Physical Disability	62	20.1	61.4
Sexual Orientation	21	6.8	58.3
All other issues	38	12.3	
Total	308	99.9	36.4

Caucasians represented a large majority of the clients alleging discrimination based on physical disability (61.4%) and sexual orientation (58.3%) as well as the highest percentage of clients alleging discrimination based on familial status (42.6%).

The number of Asian American clients is considerably small both in number (2.5% of all clients) and as compared to their percentage of the general population (13.1%).

Table 14. Asian-American Clients Alleging Discrimination

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Race	7	33.4	2.6
Familial Status	2	9.5	1.7
Arbitrary	5	23.8	2.4
All other issues	7	33.4	
Total	21	100	2.5

Almost half of the clients (46.1%) alleging housing discrimination were from female headed households, about three times the number of female headed households in the City (16%). Single females with children represented more than half of the clients (53.9%) alleging discrimination on the basis of familial status more than five times their representation within the community (10.6%). Female headed households also represented more than half of all clients alleging discrimination on the basis of race (51.3%) and more than two-thirds based on harassment (68.75), most often sexual harassment.

Table 15. Clients Alleging Discrimination from Female Headed Households

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Race	140	35.9	51.3
Familial Status	62	15.9	53.9
Arbitrary	88	22.6	41.5
Harassment	11	2.8	68.75
All other issues	89	22.8	
Total	390	100	46.1

The following table shows the breakdown of discrimination complaints by type in the zip codes with the highest concentration of clients.

Table 16. Discrimination Complaints by Zip Codes with Highest Concentration of Clients

	90802		90804		90805		90806		90813	
	#	%	#	%	#	%	#	%	#	%
Age	6	0.1	6	0.4	0	0.0	3	0.3	5	0.3
Familial Status	21	0.2	14	1.0	13	0.7	11	0.9	15	0.8
Gender	2	0.0	3	0.2	0	0.0	1	0.1	2	0.1
Marital Status	4	0.0	1	0.1	2	0.1	1	0.1	0	0.0
Mental Disability	4	0.0	1	0.1	2	0.1	0	0.0	2	0.1
National Origin	6	0.1	4	0.3	3	0.2	0	0.0	2	0.1
Physical Disability	24	0.2	4	0.3	18	1.0	7	0.6	21	1.2
Race	58	0.5	41	2.8	44	2.4	27	2.3	42	2.4
Religion	1	0.0	1	0.1	1	0.1	0	0.0	0	0.0
Sexual Orientation	1	0.0	3	0.2	3	0.2	4	0.3	2	0.1
Total # of Above Issues	127	1.1	78	5.5	86	4.8	54	4.6	91	5.1
Total # of All Issues	2,478	100.0	1,469	100.0	1,869	100.0	1,199	100.0	1,775	100.0

2) General Housing Concerns

The following table displays the number of people who contacted FHF seeking assistance with general housing concerns not directly tied to an illegal housing discrimination issue by the type of concern presented. More than nine out of every ten clients (92.8%) during this time period contacted FHF seeking assistance with general housing concerns.

Table 17: Housing Concerns by Type of Issue

Type of Issue	Number	Percent
Eviction	2,537	23.2
Habitability	2,112	19.4
Notices	1,319	12.1
Other General Housing Issue	1,086	10
Security Deposit	895	8.2
Rent Increase	650	6
General Issue	490	4.5
Harassment	346	3.2
Lease Terms	298	2.7
Utilities	278	2.5
Refusal to Rent	250	2.3

Section 8 Information	197	1.8
Illegal Entry	144	1.3
Late Fees	77	.70
Lock-Out	67	.61
Rent Control	59	.54
Parking	57	.52
Pets	48	.43
Refusal to Sell	4	.04
	10,914	100%

Of those needing assistance with general housing concerns, more than half of these clients (54.7%) contacted FHF regarding eviction related matters or habitability issues.

Table 18. Top General Housing Concerns by Zip Code

	90802		90804		90805		90806		90813	
	#	%	#	%	#	%	#	%	#	%
Eviction	498	21.2	334	24.0	470	26.4	317	27.7	402	23.9
Habitability	433	18.4	245	17.6	326	18.3	246	21.5	408	24.2
Notices	250	10.6	149	10.7	214	12.0	149	13.0	243	14.4
All other issues	1,170	49.8	663	47.7	773	43.3	433	37.8	631	37.5
Total	2,351	100	1,391	100	1,783	100	1,145	100	1,684	100

The table above presents the most prevalent housing concerns within the zip codes with the highest concentration of clients. The largest percentage of habitability issues (24.2%) reported were in zip code 90813 although the largest number of habitability concerns (433) were reported in zip code 90802.

Table 19 below presents the demographic profile of the FHF clients seeking assistance with general housing concerns over the last four years. Not surprisingly, the vast majority are low or very low income (85.9%) and non-Caucasian (65.8%).

Table 19. Types of Clients by Income, Ethnicity, and Household Status

	In-Place Tenants		Property Owners		Landlord/Managers		Rental Homeseeker	
	#	%	#	%	#	%	#	%
Income Level								
Very Low	1,098	10.1	9	3.3	6	2.7	36	19.1
Low	8,514	78.8	63	23.1	99	45.0	102	54.3
Moderate	1,075	9.9	176	64.4	80	36.4	50	26.6
High	134	1.2	25	9.2	35	15.9	0.0	0.0
Total:	10,821	100.0	273	100.0	220	100.0	188	100.0
Ethnicity								
Black or African Am	4,083	37.8	45	16.5	28	12.7	88	46.7
White or Caucasian	3,616	33.4	126	46.2	115	52.3	65	34.6
Hispanic or Latino	2,578	23.8	77	28.2	58	26.3	25	13.3
Asian*	197	1.8	9	3.3	14	6.4	5	2.7
Am Indian/Alaska Native	24	0.2	2	0.7	0.0	0.0	0.0	0.0
Other	347	3.2	16	5.1	5	2.3	5	2.7
Total:	10,821	100.0	273	100.0	220	100.0	188	100.0

Other Household								
Female-Headed	5,380	49.7					91	48.4

More than one out of every three in-place tenants seeking assistance was African American (37.8%), which is more than double the percentage of African Americans residing in the City, and almost half of the rental homeseekers were African American (46.7%). On the other hand, Latinos represented less than one of every four in-place tenants (23.8%) and only 13% of the homeseekers despite the fact that they represent more than one-third of the city's residents. While Asian-Pacific Islanders represent a significant percentage of the city's residents (13.1%), less than 2 percent (1.8%) of the in-place tenants seeking assistance were Asian-Pacific Islanders. Caucasians made up more than one-third (34.2%) of all clients but of significant note, almost half (48.9%) of the property owners and managers, a good number of whom may not reside in the City.

The following tables break out each ethnic group as well as female-headed households and identifies the type of general housing concerns presented.

Table 20. African American Clients by Type of Housing Concern

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Eviction	1,098	27.6	43.3
Habitability	781	19.7	37
Notices	468	11.8	35.5
Refusal to Rent	123	3.1	49.2
All other issues	1,501	37.8	
Total	3,971	100	36.4

Again, African Americans are greatly over-represented among the FHF clients with more than one of every three clients (36.4%). Of significant note, African Americans represent more than two of every five clients (43.3%) facing eviction issues in Long Beach, more than one-third of every client (37%) with habitability issues and almost half of every client citing a refusal to rent (49.2%) as their chief complaint.

In contrast to the other ethnic groups, Habitability was the chief concern presented by Latino clients (24.7%) as they represented almost one-third of all clients (31%) presenting this concern. Based on general observations through an increased effort to promote awareness of habitability concerns and tenant rights, the percentage of Latinos residents with habitability concerns is likely to rise.

Table 21. Hispanic/Latino Clients by Type of Housing Concern

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Habitability	655	24.7	31.0
Eviction	591	22.3	23.3
Notices	394	14.9	29.9
All other issues	1010	38.1	
Total	2650	100	24.3

Caucasian clients appeared to have the most balanced level of concerns across the board with eviction and habitability issues representing only a third (35.6%) of their concerns presented.

Table 22. White/Caucasian by Type of Housing Concern

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Eviction	738	19.8	29.1
Habitability	586	15.8	27.7
Notices	389	10.4	29.5
Security Deposit	453	12.2	50.6
All other issues	1554	41.8	
Total	3720	100	34.1

Once again, Asian Americans represented a significantly small percentage of clients (1.9%) compared to their representation in the population (13.1%). In contrast to the other ethnic groups, evictions, habitability and notices represented less than half (45.4%) of the total number of issues presented.

Table 23. Asian/Pacific Islander Client by Type of Housing Concern

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Eviction	44	21.0	1.7
Habitability	33	15.8	1.6
Notices	18	8.6	1.4
All other issues	114	54.6	
Total	209	100	1.9

One of the more noteworthy statistics revealed through the data collected is the fact that almost half (48.6%) of the clients seeking assistance with general housing concerns were from single female-headed households. The percentage of clients from female-headed households represents more than three times the percentage of female-headed households in the community.

Table 24: Housing Concerns by Household Status

Household Status	# of clients	% of clients
Female-Headed	5,711	48.6
All Other Households	6,049	51.4
Total:	11,760	100.0

The grossly disproportionate number of female headed households, particularly single females with children facing obstacles in the housing market is an alarming trend that warrants special attention in our communities. As with all household, the most common types of concerns presented by single females with children were eviction-related matters and habitability issues. The following table displays the types of issues presented to FHF by single females with children.

Table 25. Female Headed Households by Type of Housing Concern

Type of Issue	# w/issue	% of clients	% of all clients w/issue
Eviction	1207	22.7	47.6
Habitability	1115	21	52.8
Notices	606	11.3	45.9
Harassment	171	3.2	49.4
Illegal Entry	85	1.6	59
All other issues	2137	40.2	
Total	5321	100	48.6

More than half of the clients with habitability issues (52.8%) and almost half with eviction concerns (47.6%) were from female-headed households. Almost half of the clients with harassment concerns (49.4%) and an alarming majority of illegal entry complaints (59%) were from female-headed households. These percentages present a very real safety concern for the community to examine.

The next table identifies that African American women represent almost half (45.8%) of the female headed households seeking assistance from FHF and actually outnumber the non-female headed households among African Americans by a significant number. Almost nine out of ten (87.4%) of the female-headed households were low income.

Table 26: Female Headed Household by Ethnicity

Categories	Female Headed Households		Non-Female Headed Households		Total	
	#	%	#	%	#	%
Ethnicity						
Black or African American	2,616	45.8	1,700	28.1	4,316	36.7
White or Caucasian	1,780	31.2	2,248	37.1	4,028	34.2
Hispanic or Latino	1,063	18.6	1,734	28.7	2,797	23.8
Asian-Pacific Islander	104	1.8	126	2.1	230	1.9
Am Indian & Alaska Native	17	0.3	11	0.2	28	.23
Other	131	2.3	230	3.8	361	3.1
Total:	5,711	100.0	6,049	100.0	11,760	100.0
Income Group						
Very Low	693	12.1	483	8.0	1,176	10
Low	4,303	75.3	4,625	76.4	8,928	75.9
Medium	632	11.1	814	13.5	1,446	12.3
High	83	1.5	127	2.1	210	1.8
Total:	5,711	100.0	6,049	100.0	11,760	100.0

IV. Identification of Impediments to Fair Housing Choice

The following impediments to Fair Housing Choice are included in this section:

- A) The Housing Discrimination Study of 1989: Differential Treatment in Rental and Sales Markets;
- B) Random Audits of Housing Vacancies in Long Beach;
- C) Provision of Housing Brokerage Services in Long Beach;
- D) Access to Housing Credit – General Background;
- E) Provision of Financing for Residential Dwellings in Long Beach;
- F) Analysis of Local Land Use Practices and Zoning Policies
- G) Accessibility of Housing for People with Disabilities
- H) Fair Housing and Lead Based Paint

Each section is included because it contains findings based on ample local data collection (concerning the City of Long Beach) along with general background information and data (concerning the County of Los Angeles).

A. The Housing Discrimination Study of 1989: Differential Treatment in Rental and Sales Markets

1) Background Information

The Department of Housing and Urban Development (HUD) has sponsored two definitive audit studies of housing market practices: the Housing Market Practices Survey ("HMPS") of 1977 and the Housing Discrimination Study (HDS) of 1989. The HMPS used paired African American and Caucasian testers in 40 cities and established audit studies as a viable research methodology. However, the HDS, which encompassed 3800 audits in 25 municipal regions, has provided information of unprecedented depth. This audit focused especially on five regions, including the Los Angeles-Long Beach Metropolitan Region, in large part because an effort was made in the HDS to analyze the extent of discrimination faced by both African American and Hispanic renters and home-seekers.

While it is true that the HUD HDS was conducted a number of years ago, nonetheless, there are good reasons for our focus here on the HDS. The HDS is the most comprehensive examination of housing discrimination conducted to date. The 370 audits conducted throughout the Los Angeles-Long Beach Metropolitan Region provide a statistically valid and compelling sampling of the home-seeking experience in this region. For both housing consumers and providers, the home-seeking experience in this Los Angeles-Long Beach Metropolitan Region generally crosses municipal boundaries. Thus, the wide scope of the HDS study provides a useful picture of the home-seeking experience in Los Angeles-Long Beach that can be applied throughout the region.

The audit studies noted above are well suited to develop evidence of whether certain applicant groups (for example, racial minorities and/or women) are unfavorably treated

relative to other applicant groups when they seek housing. The HDS measured three aspects of unfavorable treatment: first, its incidence; second, whether it is random or systematic; and third, its severity. That is, how often do African Americans or Hispanics receive worse treatment than whites; how much of this worse treatment is based solely on their race (as opposed to being based on characteristics correlated with their race); and how seriously are they disadvantaged?

The possibility of unfavorable treatment was examined at three different stages of the housing acquisition process:

- first, housing availability, the preliminary stage where home- and apartment-seekers inquire about prospective units and are provided with information (or are turned away or ignored) by sales and rental agents;
- second, the sales effort made on behalf of the home- or apartment-seekers, including special terms and conditions offered and assistance in obtaining financing;
- third, steering -- that is, whether home- or apartment-seekers of different races are guided toward different units or different neighborhoods.

Unfavorable treatment can occur at any of these three stages. We now discuss findings for each stage, including information on Los Angeles' housing market when it is available.

2) Housing Availability

Discrimination at this stage of the housing search process involves primarily an unequal sharing of information. At the extreme, minority home- or apartment-seekers may not be told about certain units, or may not be given the opportunity to meet agents, whereas whites are. In the overall 25-city HDS study, this happens about 8% of the time for African American and Hispanic applicants. It occurs more often for rental applicants -- 12% for Hispanic, 15% for African Americans. Another 20% of minority applicants are given less information than are white applicants about the availability of units in the market. Further, housing-availability gaps are higher for applicants for suburban homes than for those seeking central-city homes.

"Severity" of unfavorable treatment is readily measured for housing availability -- how many fewer units are minorities shown (or informed about) relative to the units shown to whites? In the overall study, African American renters were shown 25% fewer units than whites, and Hispanic renters 11% fewer units. African American homebuyers were shown 21% fewer units than whites, and Hispanic homebuyers 22% fewer units.

Housing audits conducted in the Los Angeles area per se (see Yinger 1991) found that about 25% of minority homebuyers (African Americans and Hispanics) face unfavorable treatment in housing availability. The silver lining of this result is that of the 25 regions

studied, only one city (Houston) had a lower unfavorable treatment proportion for African American homebuyers, and only two (Denver and Houston) for Hispanics. The incidence of unfavorable treatment for renters was somewhat higher in Los Angeles for both minority groups. Again Los Angeles' ranking was good relative to the national average for minority renters' treatment.

3) Sales Effort

Even when an application process is successfully initiated, different groups of applicants may be treated differently by their respective agents. Agents can hustle or move slowly; they can look for ways to overcome applicants' problems or let those problems fester; they can intervene in related transactions (such as those for credit) or let applicants fend for themselves. Overall, about 45% of African American renters and 42% of Hispanic renters received a lower sales effort than did prospective white renters. Among homebuyers, less effort was made for African Americans about 46% of the time, and 47% of the time for Hispanics.

4) Steering

Steering occurs when minority homebuyers are directed to homes in higher minority, lower-income or lower-home-value neighborhoods than are white homebuyers. Steering of this sort occurred for 21% of all minority applicants in the HDS study. Overall, neighborhoods recommended to white homebuyers had 3% fewer minorities than neighborhoods recommended to minority homebuyers. The observed severity of steering was relatively low, largely because most units listed were in predominately white neighborhoods.

Steering was analyzed in Los Angeles specifically, as a focus city in the HDS, for both African American and Hispanic homebuyers; see Turner, Edwards, and Mikelsons (1991). In Los Angeles, African American homebuyers were less likely to be steered toward higher-minority neighborhoods or lower-income neighborhoods than were African American homebuyers in the other three cities studied in depth (New York, Chicago, and Atlanta). The HDS audit results suggested that over a third of African American homebuyers are steered to lower-value homes; but there were too few cases for these homebuyers to make these results statistically robust.

The results for Hispanic homebuyers were similarly limited due to a small number of cases. Nonetheless, steering data suggest that Hispanic homebuyers in Los Angeles are less likely to be steered to higher-minority neighborhoods than the national average; but about a fourth of these homebuyers are steered toward lower-value homes and/or toward lower-income neighborhoods.

The relatively lower extent of steering in the Los Angeles-Long Beach metropolitan region compared to that in the other target regions may be due to any or all of four factors:

- first, less personal discrimination (fewer racial perpetrators) than in other cities;
- second, the larger population of Hispanic residents than in such cities as New York and Chicago, and its relatively even spatial distribution;
- third, the relatively small number of African Americans in Los Angeles, and the spatial isolation of African American population centers from the sampled residential areas in Los Angeles;
- fourth, the relatively small number of advertised properties in integrated and minority neighborhoods in the Los Angeles region.

The report by Turner, Edwards, and Mikelsons (1991) emphasizes the last point. They found that census tracts that were shown or recommended to auditors in the 1989 HDS had lower percentages of both African American and Hispanic households than census tracts not shown or recommended (7.4% versus 13.1% for African Americans, and 23.4% versus 34.5% for Hispanics and Chicanos). They also found that shown and recommended census tracts had higher median incomes (\$16,342 versus \$13,415) and higher median house values (\$106,708 versus \$90,192). In a regression equation measuring the determinants of neighborhood marketing in the Los Angeles-Long Beach region, the percentage African American and the square of percentage Hispanic both took on negative signs and were statistically significant.

We should note that the authors of the HDS made an effort to geo-code steering data for Los Angeles and for four other regions. However, this effort yielded no clear results for either Los Angeles or any other region. Each of these regions had too few data points to suggest definitively whether patterns of steering were present or absent.

5) Overall results

The gross incidence of unfavorable treatment can be obtained by computing the probability that a typical minority applicant will be exposed to at least one of the above-discussed forms of discrimination. The results of the audits conducted for the HDS suggests that 46% of African American renters receive unfavorable treatment of some kind, as do 43% of Hispanic renters. The percentages for homebuyers are higher -- 50% for African Americans and 45% for Hispanics.

The overall results of the audits conducted in the Los Angeles-Long Beach Metropolitan region contain both good and bad news. The good news is that Los Angeles' overall index of housing-market discrimination is below the mean for both minority renter and homebuyer groups. The bad news is that over 40% of African American and Hispanic renters received unfavorable treatment of some sort in Los Angeles, as did over 35% of African American and Hispanic homebuyers. That these startling figures are below the national mean for the 25 cities studied in the HDS only affirms the depth of racial antipathy and suspicion as a continuing feature of American society.

B. Random Audits of Housing Vacancies in Long Beach

1) Methodology

Fair Housing Audits are random investigations of housing vacancies conducted without an actual complaint or allegation filed by a prospective housing consumer. The purpose of conducting a fair housing audit is to provide an analytical tool for the City of Long Beach and the Fair Housing Foundation to identify possible discriminatory housing practices and determine areas to focus fair housing education efforts.

A fair housing audit is a testing process focused on detecting measurable differences in the quantity, content and accuracy of information given, as well as the overall quality of service provided, to rental home-seekers by owners and managers. Through the testing process, differential treatment is measured in four basic categories - availability, terms and condition, tenant qualifications and overall contribution.

The testing is performed by "auditors" who are trained as impartial data collectors. Auditors are teamed into pairs and provided personal profiles matched as closely as possible in all relevant characteristics except the variable being tested. This characteristic variable must be one that represents a protected class by either state or federal fair housing law.

In testing for racial discrimination, for example, generally an African American (protected class) would be paired with a Caucasian (control) auditor. Both would be of the same gender, similar age and manner, and employed, earning at or above the median family income for the targeted community. The protected class auditor would be provided with a slightly higher income and more time on the job, theoretically making them a slightly more appealing candidate. Thus, any differential treatment by a housing provider would likely be attributable to the race, or the protected class status, of the housing candidate.

The same general set-up would be followed for testing familial status or any of the other protected classes under fair housing law. The key is setting up similar profiles where the only differential factor is the protected class status.

Sites for the audits are selected at random through a combination of newspaper advertisements, rental listing services and site scouting for vacancy signs within the city. Sites selected for testing are spread out throughout the city. This random method of selection is utilized to duplicate, as closely as possible, the typical rental seeking experience.

The auditors pose as bona fide home-seekers presenting their interest in renting an apartment to the housing provider, and then record their experiences in detail on an Auditor Report Form immediately following the site visit. The auditors are not told what factor they are testing. Auditors carry out their assignments and report their

experiences, independently of each other, to the Audit Coordinator, making no assumptions about the behavior of the apartment representative.

The auditor is then debriefed by the Audit Coordinator, who reviews the form and inquires about any missing information. The auditors are instructed not to discuss the experience with anyone but the Coordinator in order to maintain the confidentiality of the project and their individual audit assignments and experiences.

Data from the audit report forms are transferred onto a Comparative Data Sheet and analyzed for significant differences in receptivity, treatment, information requested, information provided and other factors common to the rental seeking process. Auditor names and profiles are removed from the report forms to ensure an objective analysis of the data.

Incidents of differential treatment are measured based on biased actions toward one of the rental seekers by the housing representative. These biased actions might include: refusal to rent/lease; misrepresentation of apartment availability; higher rental/deposit amount quoted; imposition of different application or rental terms and conditions; additional qualifications or personal information required; differential in information provided; discouraging comments offered or "steering" to other complexes.

Based on a thorough analysis of the data sheets and the observation of any differential treatment between the two rental seekers, one of five conclusions is drawn for each site visited:

- evidence of discrimination toward the protected class;
- evidence of discrimination in favor of the protected class;
- no evidence of discrimination;
- inconclusive; unable to determine if there was discrimination;
- site report not usable due to procedural error or unforeseen interference by third party.

The conclusions drawn from a series of random audits are combined to offer a general analysis of any observable pattern and practice of differential treatment. This analysis is then used to provide the City with recommendations on how to address observed impediments to fair housing choice.

2) Annual Audits of Housing Vacancies in the City of Long Beach

The Fair Housing Foundation conducts random audits on an annual basis as part of its contract to provide fair housing services to the City of Long Beach. The audits are used as an educational tool to better understand housing practices in the community and to reveal potential discrimination for specific protected classes in underrepresented areas.

In the last five years, FHF has conducted 42 random audits throughout the City based on a variety of protected class scenarios. As revealed in the table below, of the 42 audits conducted, evidence of differential treatment was identified in 12 cases (28.5%).

Table 1: Results of Random Audits 1996 – 2000.

Type of Audit	Evidence	No Evidence	Inconclusive	Total
National Origin	5	7	4	16
Race (rental)	4	5	3	12
Race (sales)	1	5	0	6
Disability	2	1	0	3
Sexual Orientation	0	2	1	3
Familial Status	0	2	0	2
Total	12	22	8	42

The following is a summary of the instances where evidence of discrimination was found during the random audits conducted over the last five years.

National Origin

FHF conducted rental vacancy audits based on national origin in each of the last five years. Evidence of differential treatment based on national origin was discovered in testing conducted in 1997 and testing conducted this year.

In 1997, a male tester of Cambodian origin was paired with a male tester of Filipino origin to conduct two tests. FHF staff determined that there was evidence of discrimination in both instances.

- At one site, FHF determined that there was differential treatment in favor of the Cambodian tester. The Cambodian tester appeared to be received more favorably than the Filipino tester receiving more information regarding unit availability and rental terms and conditions at the site.
- At the second site, FHF determined that there was differential treatment in favor of the Filipino tester. Upon inquiring about an available unit, the Cambodian tester was told to come back next week, while the Filipino tester, who arrived second, was shown an available unit.

In May of 2001, FHF conducted national origin audits involving two separate pairings, an African American tester paired with a Cambodian tester and a Latino tester paired with a Caucasian tester.

- At one site, the Cambodian tester was told by the Cambodian manager that a “Mexican” wanted to rent the available unit, but he preferred to rent to someone of his own race.

- At another site, the African American tester was given a higher rental amount for the vacant unit and that there were two applicants ahead of him. The Cambodian tester was told by the manager that all the tenants were “Asian” and encouraged the tester to apply right away.
- At a third site, the manager told the Latino tester that he was not sure when the unit would be available. The Caucasian manager also asked the Latino tester if his wife was expecting a child (his wife was not with him during the test). The Caucasian tester was told that a unit was available right away and encouraged to apply.

Race (rental)

FHF conducted rental audits based on race in four of the last five years. Evidence of discrimination based on race was discovered in 1996 and testing conducted this year.

In 1996, FHF conducted four audits based on race, two which paired an African American female tester with a Latina tester and two which paired an African American male with a male Cambodian tester. Both tests conducted with the first pair of testers revealed differential treatment in favor of the Latina tester. Tests conducted by the second pair of testers revealed differential treatment in favor of the Cambodian tester at one of the two sites.

- At one site, the African American tester knocked on the manager’s door and did not receive a response despite the fact that she heard music and voices inside the unit. Five minutes later, the manager answered the door for the Latina tester and showed her an available unit. The manager was Latino. The same two testers returned to the site at a later date. During this visit, both testers were received by the same Latino manager. The African American tester was unable to obtain pertinent rental information due to a language barrier. The Latina tester was given a rental application that was written in Spanish.
- At the second site tested by the same pair, the Latina tester was received in a much more favorable manner than the African American tester. The Latina tester was encouraged to apply and invited to contact the property management company directly. The African American tester had to specifically ask for an application and was not given information on the management company. The rental agent made negative racial comments about African Americans to the Latina tester and questioned the African American tester about her familial and marital status. FHF had the testers complete an application for the available unit. While both testers were approved for the unit, the Latina tester received more favorable terms and conditions for renting the unit.
- At one of the sites tested by the second pair, the Cambodian tester was received in a more favorable manner than the African American tester. The African American tester was shown one available unit while the Cambodian tester was shown several available units and received more information regarding rental availability and terms

and conditions. The manager encouraged the Cambodian tester by revealing that there were “lots of Cambodians in the complex” while he attempted to discourage the African American tester with comments about there being “too many kids in the area”.

In May of 2001, audits were conducted pairing an African American with a Caucasian.

- At one high income-level rental property near the shoreline, the African American tester was told by a Caucasian rental agent that there were no vacancies and that “none were expected any time soon”. The agent referred the tester to another property located at PCH and Ximeno. The Caucasian tester was told there were two units available and was shown one of the units. He was encouraged to speak with his wife and return the next day with a deposit in order to hold one of the units.

Race (sales)

FHF conducted a pair of home sales audits based on race in each of the last three years. Differential treatment was discovered in one of the tests conducted in 1999/00.

- Testing conducted in 1999/00 paired an African American female with a Caucasian female, both married with one son. Both testers attended an Open House advertised in the Grunion Gazette newspaper. Each tester spoke with the same sales agent. The Caucasian female appeared to receive more favorable treatment from the agent. She was told by the agent that an offer had been made on the house but that she would be “happy to contact her” if the sale fell through. The agent offered the Caucasian tester a business card and encouraged her to contact her for future listings. The African American tester was not provided with any of this information.

Disability

FHF conducted rental audits based on disability in three of the previous four years. Evidence of discrimination was found in two of the three tests conducted.

- In 1996/97, the testing involved a pair of Caucasian females each of whom lived with their girlfriend. One of the testers had a partner who was HIV+. This fact was presented to the manager by revealing a desire to live close to her doctor’s office. While friendly to both testers, the manager quoted a higher rental amount to the tester with the HIV+ girlfriend.
- In 1998/99, the testing involved a pair of testers living with their mother, one of whom used a wheelchair. The tester whose mother was in wheelchair bound was informed that the unit “was not feasible for her mother”. The tester asked if the unit was upstairs to which the manager replied that it “was not upstairs, just hard to get to.” The tester expressed a willingness to pay for any needed modifications to make the unit accessible to which the manager reiterated that the unit was not feasible for her and her mother and then terminated the conversation.

Language barriers

Though not directly isolated as a testing factor in any of the audits, barriers to fair housing choice based on language issues have surfaced consistently throughout the years. Vacancy scouting efforts have identified numerous rental properties in the community with vacancy signs in Spanish or Khmer only. (At least one property had a sign in Spanish and Khmer but not English). Scouting for vacancies through print media advertisements has revealed vacancy listings in non-English publications that are not advertised in English publications.

In addition to vacancy advertising, English speaking testers have run into language barriers during audits that included property managers that did not speak English, did not respond to inquiries made in English and property information available only in languages other than English.

3) Conclusions Based on Annual Audits

The results of the random audits conducted over the last five years suggest that African-Americans consistently face barriers to fair housing choice when seeking housing opportunities in the City of Long Beach. Barriers faced by African American testers during the audits included misrepresentation of apartment availability, higher rents quoted, discouraging comments offered or actions made by rental agents, and steering to other apartments located elsewhere. Combined with discrimination complaint information filed with the Fair Housing Foundation, there is a clear pattern of discriminatory housing practices experienced by African Americans in Long Beach.

Additionally, there is also an indication that language issues are emerging as a barrier to fair housing choice in the City of Long Beach. Advertising vacancies and/or conducting housing business in a single language other than English presents a clear impediment to housing opportunities to the majority of potential consumers who do not speak that language.

One final conclusion to be drawn from the annual audit process conducted in the City of Long Beach is that the practice of conducting one or two audits per protected class per year is not the most effective way to identify patterns of discriminatory housing practices. A thorough investigation designed to identify possible patterns of discriminatory housing practices would involve isolating one issue or area to test and then conducting a good random sampling (at least 10 test) to analyze. Conducting audits in this fashion would yield meaningful results upon which the City or the Fair Housing Foundation could evaluate whether further action was warranted in a particular area.

C. Provision of Housing Brokerage Services in Long Beach

In an effort to provide a comprehensive understanding of the state of equal housing opportunity in the housing market in the City of Long Beach, we invited housing professionals who provide services in this city to provide their insight. The focus group participants were recruited by the staff of the Fair Housing Foundation and open to all realtors and interested parties who serve the Long Beach community. Participants in the focus group session held at Long Beach City Hall included several practicing real estate brokers and a representative of rental property owners and managers.

Participants were asked to identify themselves and their experience in real estate. They were also asked to describe any involvement with fair housing. Participants were not offered any compensation for their participation and were assured that all of their comments would be recorded anonymously.

The focus group facilitator asked several questions concerning eight topics of discussion: 1) community characteristics; 2) clients and brokers; 3) neighborhoods; 4) steering; 5) perceptions about demographic phenomena; 6) the provision of housing brokerage services; 7) theories of discrimination; and 8) public policy. A summary of the responses follows.

I. Community Characteristics

Give me a few adjectives to describe this community in general, both positive and negative? Best kept secret in all of California. A big city 33rd largest in the U.S. and 5th in California. Strong sense of community. Diverse. Multi-ethnic. City does their best for its citizens. Pro-active. We have 107 different languages spoken in our city. Very diverse, both in having environments and races living here. It is a big little city. I don't like the politics that run the city. Not resident/business friendly.

What would you consider to be the most positive neighborhood characteristics about this city? We have distinctive neighborhoods. Neighborhood being re-claimed and residents learning political process. Lot's of new mom and pop businesses. Immigrants anchoring themselves in their own business. Long Beach welcomes 200 new businesses a year. Need to bring back stakeholder. Cost of housing is lower in Long Beach – which attracts new homeowners. Which helps residents be more responsible. Has a lot of potential. Investors like Long Beach they feel they get a better investment for their money. Best beach city buy in the state.

Are any of these characteristics likely to be more associated with any particular neighborhoods? If so, are any of these neighborhoods dominated by any particular racial group, ethnic group or class of people? Anaheim Street is a Cambodian neighborhood this is a positive thing. Lot's of new businesses. Bixby Knowles is a very nice Hasidic Jewish thriving neighborhood. Lot's of homeowners and businesses in this neighborhood. District 3 and 5 have a stigma as to where all the power is and decisions are made. District 6 was Afro-American now is primarily

Hispanic. This movement has taken place over the last 10 years. Recently you see this area becoming more mixed. We saw a lot of Wilmington and Compton residents coming to Long Beach and now we see more Hispanics coming from Los Angeles. Blacks are moving to Orange County. African-Americans very involved in local politics. Samoan Community is in the very far west end of Long Beach, residents feel very comfortable they even walk around in their traditional regalia.

What would you consider to be the more negative neighborhood characteristics about this city? One observation is that rentals along Ocean Blvd. used to be top rents and all white during the recession when rents went down it was made available to anybody and everybody and took away an exclusive area. The profile changed from a higher class of people to lower class of people. On Naples and Virginia Country Club. North Long Beach has the only two exclusive areas left in Long Beach. North Long Beach has a stigma of being the poor area, yet Naples and Virginia Country Club areas are in the North part of Long Beach. Don't let *them* know!

Long Beach is divided into two cities North Long Beach is the black sheep of the City it is almost like we have two cities.

Are any of these characteristics likely to be more associated with any particular neighborhoods? If so, are any of these neighborhoods dominated by any particular racial group, ethnic group or class of people? People living in North Long Beach feel they have been rebuffed because it is a poor area. City has been doing a lot of eminent domain in North Long Beach and city would not consider this in any other district!

II. Clients and Brokers

How do you generally find your clients, both potential buyers and sellers or renters? Advertising through flyers and in the newspapers. Signage.

What generalizations can you make about your clients housing preferences?

Everyone wants more than they can afford. The renter wants the best-perceived value for their rent. More sophisticated than 5 years ago. Clients are very selective. People are *choosing* to rent because of life styles.

What is the general racial or ethnic make-up of your clientele?

It is very diverse. In Long Beach no one has one group we have everybody. "About 1 ½ ago I saw a banner on an apartment building saying "No Philipinos". About three years ago a client told me she wanted to rent only to Indians from India. Families with children, but people still don't want to rent to families with children. Due to amenities such as pool, stairs, etc. People are concerned of the liabilities when renting to children. It is a real concern. "People need to learn to learn to appreciate other cultures".

Are you aware of brokers/property managers that tend to deal rather exclusively with clients of one particular race or ethnicity? Yes, it is called money. Cambodian community tends to want to work with Cambodian brokers. Clients tend to ask for brokers that speak their own language.

In your experience, do language barriers play a role in clients dealing with brokers? Yes, the client usually wants a broker that speaks their language.

III. Concerning Neighborhoods

What positive characteristics are your clients looking for in a neighborhood or rental complex? Do any of your clients associate these characteristics with any particular racial or ethnic group? Other factors? Safety is #1. Clients want quality and safe housing. They want parks and sidewalks in good condition. Clean neighborhoods. People of color tend to discriminate.

What negative characteristics are your clients trying to avoid in a neighborhood or rental complex? Do your clients associate these characteristics with any particular ethnic group? Other factors? A client came a husband and wife and they brought their son with them to my office and when we were talking about a certain neighborhood the son stated that he did not want to live there because of armed gangs. Hate crimes, burglars, prostitutes, gangs, dirty areas and graffiti. All residents of color are much more aware of gangs and the different groups. They themselves say I don't want to live in that area because of Chilean gangs.

How do clients generally learn about the neighborhoods or rental complex they are considering living in? By word of mouth. Clients drive by and see.

In your experience, is the racial or ethnic make-up of a neighborhood or rental complex an important factor for people deciding where to live in this city? Other factors? Safe and clean housing and nice neighborhoods with parks and sidewalks in good conditions is primary factor.

Have any neighborhoods in this city gone through any major shifts in racial or ethnic make-up (or other protected class)? If so, was it considered a good or bad thing? Why? The 6th District, this area went from predominantly Black to Hispanic. Also, a little in Westside on eastside of the 710 Freeway has shifted. This area shifted from a very tough neighborhood to more families.

IV. Concerning Steering

How do you decide what neighborhoods to show prospective buyers? In your experience, do agents in this community use their own judgment in deciding what neighborhoods to show homes/rental property to prospective buyers/renters? Based on what they can afford. By the clients asking.

Do you ever have clients or hear of clients, sellers or buyers, who express racial or ethnic (or other protected class) preferences or concerns in a community? We have a Chinese, Korean, and Japanese Organization that gets money to build housing and then they ask how can they bring in only residents from their ethnic groups. Our clients want a good investment that is their main concern.

Do clients seek or avoid communities based on the racial/ethnic composition? Other protected class? Yes, they do.

Do agents in this community practice steering? If someone says what can I afford and you tell them this is the neighborhood you can afford.

V. Perceptions about Demographic Phenomena

In general, how do your clients value homogeneity (one race or one culture) vs. heterogeneity (more than one group or culture) in their neighborhoods/rental complex? Looking for affordability and as nice as they can be. People tend to want to live where they are comfortable. People do ask for a neighborhood where their language is spoken. Families want to stay together.

In terms of neighborhood housing patterns, do you consider Long Beach to be a segregated or integrated city? If so, describe the segregation or integration patterns? Very integrated. There are 107 languages taught in our schools. Long Beach has a little of every body.

Are segregated or integrated housing patterns a problem and if so why? Neighborhoods at this time are not up in arms it was horrible about four years ago. Because economy has gotten better the problem has gone away.

Many people believe that when a neighborhood goes through a racial transition - for example from White to Black - or from one ethnic group to another - the neighborhood deteriorates; housing values go down, schools decline, crime goes up, etc. Has this been the perception in this city? Do you believe it is the reality? Why or why not? It was a perception about 30 years ago with block busting. We are getting so integrated now that people are saying they don't care who is buying my home or moving next door to me. About 10 years ago White flight was due to crime, and it was pinpointed to certain groups.

In the 70's, the term "White flight" was used to describe the above phenomenon. Some believe that a similar sort of "Black flight" occurred in the 90's with Latinos moving into traditionally Black neighborhoods and Blacks moving out. Do you think this or any similar phenomenon has occurred in Long Beach? Why do you think this has happened? Yes, Blacks are moving to Orange County and Hispanics are moving in from Los Angeles.

VI. The Provision of Housing Brokerage Services

Do you think housing discrimination in the real estate industry has gotten better, worse or stayed the same over the past decade? It has improved because of education and awareness of diversity. People weren't aware of what they were doing.

Have you ever had a real estate transaction in Long Beach fall through based on questionable actions by an appraiser? Lending agent? Insurance agent? Others?
No. There is redlining especially with Insurance Companies. Banks do it but they are discreet

Do you think that, if money is not a problem, a person of color, family with children, female headed household, disabled person or gay/lesbian, can rent a unit or buy a home anywhere in Long Beach? Yes, problem is with our disabled community and fear of ADA and how it is done. Unfortunately in Long Beach the handicap community is so forceful they don't solicit the help they can get.

Do minority brokers/agents have equal access to clientele and industry resources in this area? If they have money. Need money to get business going. Economics.

VII. Theories of Discrimination

Let me give you three theories that have been advanced about why housing discrimination exists and get your reaction:

"People discriminate because of their personal animosity towards people of other races, ethnicity, sexual orientations, familial status, physical capacity, etc.?" No, people tend to generalize

"People discriminate because they are afraid of upsetting other tenants, or their neighbors, if they were to integrate their building or neighborhood"
No, maybe if you had a gang that could cause a problem

"People discriminate because they harbor certain stereotypes about others. For example, Blacks are noisy and violent or Latinos are gang bangers and overcrowd the neighborhood, etc." Feeling that only uneducated people would do these things. NIMBY is Long Beach; this is going to be a big pain as we try to bring in more housing. Density, too much traffic. There is a great resentment to the Section 8 Program, not because of the people, but because of the process, the bureaucracy. Those "people", means poor people.

VIII. Concerning Public Policy

Do you think that housing discrimination is better or worse than in 1968? 1988? 1995? 1968 = Horrible, 1988 = Better, 1995 Improved. In 1988-1995 real estate slide helped mitigate discriminatory experience.

Are you aware of the general provisions of the federal and state Fair Housing Laws? Yes.

Do you think that the Fair Housing Laws are reasonable? Yes, absolutely an outrage that people are forced to settle. Morally bankrupt for people to discriminate in any of the protected classes. 4 levels of enforcement – we should be tried once and at all four levels.

Do you think that government should have a role in promoting equal access to housing? There ought to be a real level hand in fairness. The way it stands now people's lives can become topsy-turvy.

Do you have any suggestions about what government should or should not do about housing discrimination? How about segregation? The government represents clients. Government should at least give legal fee compensation. If the government wants equal access as much as owners do, then more mediation and education is where emphasis should be and that would show the governments commitment to providing equal access.

Prior to today, were you aware of the Fair Housing Foundation and their services? How about your friends or clients? Yes, absolutely! We believe the Fair Housing Foundation does an excellent job and should be a model for educating residents and owners.

Do you have any final thoughts to share? "I never hesitate to give clients the Fair Housing number".

D. Access to Housing Credit - General Background Information

1) The legal context of barriers to credit markets

In the United States, economic security and advancement is based on owning a home and acquiring a home depends to a large degree on having access to credit. Credit provides a market channel for channeling spending power to households and firms that can use it productively. If this market channel malfunctions, only inside channels such as other family members can be tapped, and the economic game becomes unfair to have-nots.

So equality of opportunity and fair access to markets (including credit markets) are linked. Laws passed in the 1960's and 1970's make this link clear and legally enforceable. Of these laws, the Civil Rights Act of 1964 stands out. This Act clarified that people and institutions that control economic resources cannot legally discriminate on the basis of race, gender, age, or physical status. The 1968 Fair Housing Act affirmed that the Civil Rights Act covered housing:

"It shall be unlawful for any person or other entity whose business includes engaging in residential real estate-related transactions to discriminate against any person in making available such a transaction, or in the terms or conditions of such a transaction, because of race. (42 U.S.C., sec. 3601-3631 (1988))."

The Equal Credit Opportunity Act (ECOA) of 1974, in turn, makes racial discrimination illegal in credit market decisions.

Federal responsibility for seeing that financial and housing markets operate equitably was strengthened in the 1970s. The 1975 Home Mortgage Disclosure Act (HMDA) requires banks and other depository institutions to provide annual data on their mortgage lending by census tract. The 1977 Community Reinvestment Act affirms the responsibility of banks and other depository institutions to meet credit needs throughout their entire market area, no matter how income and race vary within this area. It also requires that banks not define their market areas in a manner that discriminates against minority areas. In 1989, the HMDA was amended to require lenders to submit more detailed evidence (on applications, not just loans), and more types of lenders (including mortgage companies) were required to report under HMDA.

So federal law makes it illegal for lenders to practice either discrimination or redlining in credit and housing markets. Discrimination occurs whenever minorities (or any group protected by law) are more likely to be turned down in a given market transaction than are whites or when minorities can make a given transaction only at a higher cost or worse terms than whites.

Redlining occurs when a given market transaction costs more or occurs less often in a geographic area with a high minority population (or in an inner-city location) than in a low minority (or suburban) area, even when differences in these areas' economic

characteristics are considered. So, discriminatory credit practices create disadvantages for a housing agent independent of their location; redlining practices create disadvantages for a housing agent in a location independent of their individual characteristics.

2) Detecting evidence of credit-market barriers

Numerous court cases and Congressional fine-tuning have clarified the legal meaning of discrimination. In March 1994, the federal agencies responsible for punishing credit-market discrimination issued a unified policy statement incorporating these clarifications. Three types of discrimination are identified:

- overt discrimination -- refusing to initiate a transaction with a person of color;
- disparate treatment -- screening minorities more harshly than whites in application processes, or subjecting minority applications to different application processes;
- disparate impact -- conducting commercial practices that disproportionately harm a racial minority without being justified by a legitimate business need.

Economists and legal experts agree that the first two types of discrimination can best be detected through well-designed, direct "tests" of whether the procedures of lenders, real-estate agents, and others are racially neutral. But detecting the third type of discrimination requires the use of indirect, not direct evidence.

Experts disagree about what standard of proof for indirect evidence is required to demonstrate an "unfair" pattern of credit flow. The problem is that differences between groups (say, white and African American loan applicants) or areas (say, minority and white neighborhoods) may arise either because of market-based reasons, such as differences in income or wealth, or "irrational" reasons such as stereotyping or preferential treatment. In general, the federal government is willing to go "after" discrimination-based disparities, but not market-based disparities. In practice, the line between the two is blurry; and how this line is drawn over the past 20 years has depended on the political climate.

Redlining has not been given a precise legal meaning, since the legislation creating it is less definite in prescribing what behaviors constitute a failure to provide credit equitably over bank market areas. The CRA itself provides that "credit needs" should be met uniformly; but economists have no established method of determining such needs. In practice, redlining has been measured by testing for credit-market "fair share." Simply put, every neighborhood should receive its "fair share" of credit flows, adjusted for the prices of its homes.

3) Evidence of discrimination and redlining

What kind of evidence do studies and regulators find concerning discrimination and redlining in credit and housing markets? Definitive proof of discrimination is hard to

come by, because this proof would have to take into account all factors that lenders may legitimately use before demonstrating conclusively that lenders are biased.

The only city for which definitive proofs of discrimination in credit markets have been established is Boston; and even the various studies of Boston still have their critics who refuse to concede the discrimination has been proven. Boston's studies were special because researchers got complete access to lenders' data files on loan applicants. In many studies elsewhere in the US, suggestive evidence -- if not definitive proof -- of credit-market discrimination has been produced using HMDA data.

While experts agree that HMDA data cannot be used to "prove" discrimination by banks and other lending institutions, experts also agree that these data can be used to determine whether discrimination may be occurring. In sum, HMDA data can be used to conduct a diagnostic analysis of whether discrimination may be a problem in any area.

The detection of **redlining** presents fewer measurement problems than that of discrimination. Redlining may occur whenever there are significant social differences between any two sub-areas within a larger community: suburb vs. inner-city; professional vs. working class areas; largely white vs. largely minority areas. Most redlining analyses test for lending gaps between areas with differing racial compositions.

Studies of racial redlining follow a three-step procedure. First, the community being analyzed is subdivided according to the percentage of minority residents in its various sub-areas (census tracts). Second, sub-area loan flows and approval/denial rates are compared. If differences are found (for example, if minority areas received lower credit flows), then an effort is made to determine whether these differences are attributable to economic fundamentals. Third, further tests on loan flows and denial rates are run, taking economic factors into account. If significant racial gaps exist after accounting for economic factors, then redlining is found. Evidence of redlining is always "suggestive" and not "definitive" because so many different economic and social variables interact in communities.

This study relies exclusively on suggestive evidence of discrimination and redlining in the credit market. Achieving definitive evidence of discrimination would require more detailed information than HMDA and Census data can provide.

4) Discrimination and Predatory Lending

The Sub-Prime lending market has increased exponentially in the last few years, and unfortunately so have the predators seeking to make as much profit as possible out of vulnerable homeowners—most of whom are minorities, elderly and low-income. There have been many meetings and academic discussions lately about what to do about predatory lending including those at the federal level.

As a result, new information has developed about predatory lending and what can be done to prevent it. Thus, this section outlines what predatory lending is and what the City of Long Beach can do about it.

Predatory lending occurs when lenders seek out an individual or neighborhood because some unique aspect of that individual or neighborhood disposes them, or makes them vulnerable to, the loan the predatory lender wants to make. Predatory lenders target vulnerable consumers and use an array of practices that strip home equity from their homes.

Existing anecdotal and documentary evidence suggests that the typical victim of the predatory lender is elderly, female, and lower/moderate income; in many cities, the predatory practices disproportionately affect minority group members and minority communities.

Predatory loans are based upon home equity. Such loans become abusive when excessive fees, high interest rates, and costly and unnecessary insurance policies, large balloon payments, broker fees tied to interest rates, and repeated refinancing that steadily increase a borrower's debt are structured within the loan. The loan that the lender sells is unfavorable - perhaps even financially ruinous - for the borrower.

The City of Long Beach and the Fair Housing Foundation should establish a "No Tolerance of Predatory Lending" educational campaign. The campaign should warn about the following practices:

1. **Misrepresenting (or hiding) critical loan terms.** For example, the borrower may believe that their loan payments will never change, but the lender may actually have given the borrower an **Adjustable Rate Mortgage (ARM)** that will fluctuate and increase depending on the index the rate is tied to. Or the lender may structure the loan so that at the end of the loan period, the borrower still owes most of the original money borrowed. The homeowner usually cannot afford to pay the **balloon payment** at the end of the term, and either loses the home through foreclosure or is forced to refinance with the same or another lender for another term at additional high costs.
2. **Failing to advise consumers of their right of rescission.** Rescission means canceling the loan. After signing home equity loan documents, the borrower has 3 days (excluding Sunday) to cancel the loan. The borrower must be informed at closing that they have this right.
3. **Flipping.** Flipping involves repeated refinancing of the loan by rolling the balance of the existing loan into a new loan instead of simply making a separate, new loan for the new amount. Flipping always results in higher costs to the borrower. Because the existing balance of one loan is rolled into a new loan the term of repayment is repeatedly extended through each refinancing. This results in more interest being paid than if the borrower had been allowed to pay off each loan separately.

4. **Establishing repayment terms that the lender knows can never be met by the borrower.** Some predatory lenders purposely structure the loans with monthly payments that they know the homeowner cannot afford. The idea is that when the homeowner reaches the point of default, they will return to the lender to refinance. This provides the lender additional points and fees. Other predatory lenders may purposely structure loans with payments the homeowner cannot possibly afford in order to acquire the house through foreclosure.
5. **“Packing” the loans with extraordinarily expensive (single premium) credit life/disability insurance.** Predatory lenders will often market and sell credit insurance as part of their loans. A single large payment for this insurance may be charged and financed into the loan with interest paid over the course of the whole loan. Often, the borrower is not aware that they are purchasing this insurance, or the lender may tell them that they must purchase this insurance in order for the loan to be approved.
6. **Charging undisclosed and/or improper fees.** For example, brokers may charge fees for which there were no services rendered, or home improvement contractors may receive “referral fees.”
7. **The “Home Improvement” Loan.** In this type of scam, a contractor may contact the homeowner and offer to install a new roof or remodel the kitchen at a price that sounds reasonable. The homeowner would like to have the work done, but can’t afford it. The contractor then offers to arrange the financing through a lender they “happen to know.” The homeowner agrees to the project, and the contractor begins work. At some point after the contractor begins, the homeowner is asked to sign a lot of papers. The papers may be blank or the lender may rush the homeowner to sign before there is time to read them. The contractor threatens to leave the work on the house unfinished if the homeowner refuses to sign, so the papers are signed. Later, the homeowner realizes the loan is a home equity loan, and that the costs and fees of the loan are very high. Financing arranged by a contractor is probably not in the homeowner’s best interest, but will always be in the lender’s and contractor’s best interest. Often the work on the home may not be done right or even finished.
8. **Bait and Switch.** The lender offers one set of loan terms when the homeowner applies, then pressures the homeowner to accept higher charges when the papers are signed, threatening to cancel or postpone the transaction unless the papers are signed that day.

The campaign should also provide information about "how to look for the right loan." The following suggestions should be included to help the homeowner avoid getting trapped into a predatory loan.

1. **Shop around.** Costs can vary greatly! Contact several lenders – including banks, savings and loans, credit unions, and mortgage companies. Ask each lender about the best loan for which you qualify. Find out if you can qualify for a “prime” loan as defined earlier in this booklet. Find out whether the institution you are going to is a sub-prime lender. If it is, you will probably get a sub-prime loan from

them even if you can qualify for a prime loan. Ask for and compare the following information at several lenders:

- **The Annual Percentage Rate (APR)** which is the single most important thing to compare when shopping for a loan.
- **The term of the loan.** How many years will you make payments on the loan?
- **The monthly payment.** What is the amount? Will it stay the same or change?
- **Is there a balloon payment?** This is a large payment usually at the end of the loan term, often after a series of low monthly payments. When the balloon payment is due, you must come up with the money. If you can't, you may need another loan, which means new closing costs.
- **Is there a prepayment penalty?** These are extra fees that may be due if you pay off the loan early by refinancing or selling your home. Prepayment penalties may force you to keep a high-rate loan because getting out of the loan becomes too expensive. Try to negotiate this provision out of your loan agreement.
- **Does the loan include a charge for any type of credit insurance, such as credit life, disability, or unemployment insurance?** Is the credit insurance required as a condition of the loan? If not, how much lower would your monthly payment be without the credit insurance? Before deciding to purchase voluntary credit insurance from a lender, think about whether you really need the insurance and check with other insurance providers about their rates.
- **Lastly, ask each lender to provide, as soon as possible, a written “good faith estimate”** that lists all charges and fees you must pay at closing. Although not always required, these estimates make it easier to compare terms from different lenders.

E. Provision of Finance Assistance for Residential Dwellings in Long Beach

1) Evaluation of Credit Market Activity in Long Beach

We now turn to an examination of housing credit market activity in the City of Long Beach. It is important to look into the problem of discrimination and redlining in local credit markets because of the tremendous ethnic diversity of the Los Angeles region as a whole, and because Long Beach is a “majority minority” city.

The following evaluation of Long Beach’s credit markets is based on Home Mortgage Disclosure Act (HMDA) data collected in the year 2000. HMDA data is collected at the census-tract level and reviewed both citywide and at the census tract level. HMDA can provide a useful picture of home mortgage lending activity in a given area and can pinpoint potential problem areas for further investigation. HMDA data has also been used successfully in detecting “redlining,” where lending institutions fail to make loans in older, inner-city and minority communities.

As discussed earlier, it is difficult to draw definitive conclusions on discriminatory lending behavior based solely on HMDA data analysis. However, a cursory review of lending activity in Long Beach over the last year does suggest that discrimination and redlining are issues that warrant more detailed review and analysis of the credit market situation in the City of Long Beach.

2) Who are the Participants in the Long Beach Residential-Credit Market?

We will first take a look at who applied for mortgage credit on a home in Long Beach in 2000. Table 1 presents the total number of home loan applications submitted citywide in 2000 along with the total number of originations and denials separated by white applicants and minority applicants. The Table 1 also breaks out the above information by income level amongst white and minority applicants separately.

There were a total of 19,272 home loan applications in the City of Long Beach during the year 2000. Almost four out of every ten (39.3%) loan applicants were white, while more than one in three (35%) were minority. One quarter of the applicants (25.7%) were listed as “other” which includes applicants who were not identified by race on their applications. Amongst the white applicants, more than four out of five were middle or upper income (81.8%) and only one in eight were low or moderate income (12.7%). Amongst minority applicants, almost three out of four were middle or upper income (72.7%) and more than one out of five were low or moderate income (22.2%).

Table 1: Long Beach 2000 HMDA Mortgage Summary

MORTGAGE ACTION TOTALS	ALL APPLICANTS				MINORITY APPLICANTS			WHITE APPLICANTS		
	TOTAL	MINORITY	WHITE	OTHER	LOW OR MODERATE INCOME	MIDDLE OR UPPER INCOME	INCOME LISTED AS 'NA'	LOW OR MODERATE INCOME	MIDDLE OR UPPER INCOME	INCOME LISTED AS 'NA'
APPLICATIONS	19,272	6,737	7,579	4,956	1,497	4,865	375	960	6,197	422
ORIGINATIONS	9,874	3,453	4,811	1,610	707	2,536	210	521	4,019	271
DENIALS	4,555	1,599	1,198	1,758	401	1,117	81	181	957	60

MORTGAGE ACTION TOTALS	APPLICANT RACE					CO-APPLICANT RACE				
	TOTAL MINORITY APPLICANTS	AMERICAN INDIAN OR ALASKAN NATIVE	ASIAN OR PACIFIC ISLANDER	BLACK	HISPANIC	TOTAL MINORITY CO- APPLICANTS	AMERICAN INDIAN OR ALASKAN NATIVE	ASIAN OR PACIFIC ISLANDER	BLACK	HISPANIC
APPLICATIONS	6,424	81	1,376	1,776	3,191	3,059	51	712	512	1,784
ORIGINATIONS	3,245	44	748	837	1,616	1,625	26	400	252	947
DENIALS	1,549	16	286	473	774	682	10	150	129	393

Note 1: For the purpose of this report, "Minority" is defined as an Applicant or Co-Applicant in one of the above Census Bureau categories.

Note 2: Applications do not include Purchased mortgages.

Table 1 also shows the total number of minority home loan applicants delineated by race/ethnicity. Hispanic/Latinos represent only one in every six loan applicants (16.6%) well below their representation within the city (35.8%). Black/African American and Asian/Pacific Islander applicants represented less than one of every ten applicants (9.2% and 7.1% respectively), both more than five percent below their representation within the City (14.5% and 13.1%) respectively.

3) Analysis of Discrimination in the Long Beach Credit Market

We will now review lending activities and patterns in Long Beach to detect whether there is evidence of differential treatment toward different racial/ethnic groups in the City. Table 1 shows both origination and denial rates for loan applicants citywide in 2000. In total, 19,272 applications were made for home loans in Long Beach during the year 2000. Of this total 9,974 loans were originated (51.2%) and 4,555 applications were denied.

Examining these numbers by percentage of applications within each racial/ethnic group, Table 1 shows that there are noticeable gaps between origination and denial rates for white applicants and minority applicants in Long Beach. There is a significant difference (12.2%) in the loan origination rate for white applicants (63.5%) and that for minority applicants (51.3%). The difference in denial rates is also significant (7.9%) between white (15.8%) and minority applicants (23.7%).

The gap in origination rates is widest for African American applicants who had an origination rate of less than half the loan applicants (47.1%). Half of the loan applications submitted by Latinos (50.6%) were originated while Asians applicants had an above average origination rate (54.4%). The gap in denial rates is again widest for African Americans with more than one quarter (26.6%) of the applicants denied followed by Latinos with almost one-quarter (24.2%) denials. Asian applicants had one in five applicants denied (20.8%).

What might explain these gaps between white and minority applicants in home-loan actions in Long Beach? One simple explanation would be that the difference is purely economic. If minority applicants have lower income levels then they are potentially “less creditworthy” when considered as a group. Thus if the gaps between white and minority applicants are related to systematic differences in income levels, this income gap should be taken into account in analyzing lending gaps.

Again we turn to Table 1, this time examining the origination and denial rates as a function of income for both white and minority applicants. White applicants did have a higher percent of middle and upper income applicants (81.8%) than minority applicants (72.7%). This might explain some of the difference in origination and denial rates. However, the more significant comparison is in the origination and denial rates between each income group. Here we continue to find noticeable gaps between white and minority applicants.

Low-to-moderate-income white applicants experienced above average origination rates (54.3%) and below average denial rates (18.8%). Less than half of the low-to-moderate-income minority applicants (47.2%) had their loans originated and more than one-quarter had loans denied. This shows gaps of 7.1% in origination rates and 7.9% in denial rates between white and minority applicants in this income class. Of significant note, the difference is even greater in origination rates among middle and upper income applicants with a gap of 10.5% between white origination rates (64.8%) and minority origination rates (52.1%) and 7.6% between white denial rates (15.4%) and minority rates (23%). Data on income by race/ethnicity was not available for this study but given the trends, we can assume that African Americans experienced even more significant gaps in origination and denial rates by income-level.

We next examined lending activity by Community Development Impact Areas. Tables presenting mortgage applications, loan originations and mortgage denials by census tract within each district are attached to this document as Appendix A.

Examining the differences in origination and denial rates between whites and minorities by these districts also display some significant gaps. In four of the five districts, white applicants overall received higher origination and lower denial rates. In the Central District, the gap between origination rates was 7.2%, in the Downtown District the gap was 5%, in the North District the gap was 5.5% and the East/Airport District the gap was 8.8%. The gap in denial rates was 5.1% in the Central District, 2.1% in the Downtown District, 6.7% in the North District and 5% in the East/Airport District. The West District displays the opposite pattern with minorities receiving the favorable gap in originations by 10.3% as well as denials by 3.8%.

One anomaly to the pattern displayed above is the fact that low-to-moderate income minority households appear to fare much better in most districts when compared to white households than do middle-to-upper income minority households. Low-to-moderate income minority households had origination rates equal to or higher than low-to-moderate income households in four of the five districts. However, there was a large gap between white (62%) and minority (45.7%) origination rates in the East/Airport District among low-to-moderate income applicants. On the other hand, middle-to-upper income minority households experienced gaps in origination rates of 5% or more in the same four districts sighted in the above paragraph.

While the information in this section serves to raise some eyebrows, it is merely “suggestive” and hardly enough to determine that there is a systematic practice of discriminatory lending taking place in Long Beach. Yet, there is enough of a pattern here that, combined with other trends identified in this study, suggest that more detailed study and analysis is needed to determine if there systematic differential treatment for minorities, particularly African Americans and Latinos, taking place in the Long Beach residential credit market. At the very least, the data suggests that a stronger effort should be made to promote homeownership opportunities and encourage improved lender performance in awarding credit to African American and Hispanic/Latino households.

F. Analysis of Local Land Use and Zoning Practices

Part of the required actions for this report include an analysis of each jurisdiction's Zoning Code practices and their impact on fair housing choice. In particular, HUD requires the city to: 1) explain whether the development of affordable housing is affected by local jurisdiction policies including zoning ordinances and land use controls; 2) identify barriers and local restraints that impede the development of affordable housing; and 3) describe actions to eliminate or reduce barriers to affordable housing. This section is meant to identify and analyze barriers to fair housing choice by addressing one impediment at a time.

A. Special Use Permits

Impediment: Application of a Conditional Use Permit

Current Practice: The Zoning Code distinguishes Senior Citizen Housing and Handicapped Housing from other Single-Family Residential and Multi-Family Residential uses by the application of a conditional use permit.

Analysis: This distinction can become discriminatory against persons protected by the classes of disabilities and family status as defined by the Fair Housing Act as amended in 1988 and California Assembly Bill 2244 when their housing and related services are subjected to Conditional Use Permit requirements not equally imposed on similar Single-Family Residential and Multi-Family Residential uses (see tables below).

Proposed Action: The residential use classifications of Senior Citizen Housing and Handicapped Housing should be amended so that they are treated identically to other similar Single-Family Residential and Multi-Family Residential uses.

Summary

The House Committee Report accompanying the Fair Housing Act as amended in 1988 stated that the Act was "intended to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of (the disabled) to live in the residence of their choice in the community." (H.R. Rep. No. 100-711, 100th Cong., 2nd Sess. 24, 1988). In addition, the strongest fair housing legislation in the country went into effect in the State of California on January 1, 1994. This is Assembly Bill 2244 (Polanco). This bill addresses discriminatory land use practices and protected classes of persons. Section 12955 (I) explicitly prohibits discriminatory "public or private land use practices, decisions, and authorizations." This section refers to restrictive covenants, zoning laws and denials of use permits as examples of possible discriminatory practices. Zoning regulations precluding or diluting the right of access to housing may be subjected to heightened scrutiny under the due process or equal protection clauses of AB 2244. Section 18 outlines the Legislature's intent concerning "findings and declarations regarding unlawful housing practices prohibited by this act." They are:

- a. "That public and private land use practices, decisions, and authorizations have restricted, in residentially zoned areas, the establishment and operation of group housing, and other uses;"
- b. That persons with disabilities and children who are in need of specialized care and included within the definition of familial status are significantly more likely than other persons to live with unrelated persons in group housing;"
- c. That this act covers unlawful discriminatory restrictions against group housing for these persons."

Concerning Senior Citizen Housing

The Zoning Code defines senior citizen housing as "any housing constructed and maintained exclusively for residents over fifty-five years of age for active senior housing or over sixty-two (62) years of age for traditional senior housing, other than residential care facilities for the elderly (Ord. C-6822.4, 1990: Ord. C-6533.1 (part), 1988.

Impediment: Application of Conditional Use Permit

Current Practice: The Zoning Code distinguishes Senior Citizen Housing from other similar Multi-Family Residential uses by the application of a conditional use permit.

Analysis: Housing for seniors is protected by law (e.g. California Government Code Section 65008). Discrimination may occur when their housing and related services are either prohibited in zone classifications where single-family residential and multi-family residential are allowed or when senior housing is subjected to Special Use Permit requirements not equally imposed on other similar single-family residential or multi-family residential uses. Local governments may not require such permits unless they are required of other dwellings of similar use.

As noted in the table below, special group residence - senior housing is conditionally permitted in the R-4 residential districts while a similar use such as multi-family dwelling is permitted by right.

Table 1. Use Classifications for Multi-Family Residential Districts

	Three-, Four-, and Multi-Family Residential Districts						
	R-3-S	R-3-4	R-3-T	R-4-R	R-4-N	R-4-H (d)	R-4-U
Single-Family Detached	Y	Y	N	Y	Y	Y	Y
Single-Family Attached	Y	Y	Y	Y	Y	Y	Y
Duplex	Y	Y	Y	Y	Y	Y	Y
Three-Family Dwelling	Y	Y	N	Y	Y	Y	Y
Four-Family Dwelling	Y	Y	N	Y	Y	Y	Y
Multi-Family Dwelling	N	N	N	Y	Y	Y	Y
Townhouse	Y	Y	Y	Y	Y	Y	Y
Modular or Manufactured Housing Unit	N	N	N	N	N	N	N
Mobile Home Park	C	C	C	C	C	C	C

Secondary Housing Units	A	A	A	A	A	A	A
Special Group Residence -Senior Housing	N	N	N	C	C	C	C
Special Group Residence -Handicapped Housing	N	N	N	C	C	C	C
Special Group Residence -Residential Care Facility	N	N	N	C	C	C	C
Special Group Residence -Communal Housing	N	N	N	C	C	C	C
Special Group Residence -Convalescent Hospital	N	N	N	C	C	C	C

The four R-4 residential zoning districts established by the city are defined as follows within the Zoning Code:

- The R-4-R district is a moderate density, multifamily residential district with restrictions on building height. It is intended to provide a moderate density use consistent in scale with existing older and lower density developments. The district is designed to encourage full development in established moderate density neighborhoods. This implements land use district No. 3B of the general plan.
- The R-4-N district is a high density, multifamily residential district. It is intended to meet the demand of a broad segment of the population which provides a diversity of housing choices. This implements land use district No. 4 of the general plan.
- The R-4-H district is a high-rise, high density, multifamily residential district. The district is intended to encourage residential development with a distinctive urban living environment. This implements land use district No. 6 of the general plan.
- The R-4-U district is a high-density, multifamily residential district. It is intended to provide housing opportunities in an urban context and design style to support downtown activity center employment with adjoining housing. This implements land use district No. 5 of the general plan. (Ord. C-6933 § 10, 1991; Ord. C-6684 § 41 (part), 1990; Ord. C-6533 § 1 (part), 1988).

Senior housing is also not permitted or conditionally permitted in commercial zoning districts in which multi-family housing is permitted. Table 2 below shows that senior housing is not permitted in the CNR district. This district is defined as "a mixed-use district permitting small scale commercial uses and/or moderate density residential development at R-3-T densities."

The table 2 also reveals that senior housing is conditionally permitted in the CCR and CCN districts while multi-family residential is permitted by right. The Community R-4-R (CCR) District is "similar to the Community Auto-Oriented District, but also permits moderate density residential development at R-4-R densities." The Community R-4-N (CCN) District is also similar to the Community Auto-Oriented District, and also "permits medium density residential development at R-4-N densities."

Table 2. Commercial Zoning Districts

	Commercial Zoning Districts						
	Neighborhood Districts			Community Districts			
	CNP	CNA	CNR	CCA	CCP	CCR	CCN
Artist Studio with Residence	AP	AP	AP	AP	AP	AP	AP
Caretaker Residence	AP	AP	AP	AP	AP	AP	AP
Group Home (6 or less)	N	N	Y	N	N	Y	Y
Residential Care Facility (7 or more)	N	N	N	N	N	C	C
Residential Historic Landmark Building	*	*	*	*	*	*	*
Senior Housing	N	N	N	N	N	C	C
Handicapped Housing	N	N	N	N	N	C	C
Special Group Housing	N	N	N	N	N	C	C
Single-Family Residential	N	N	Y	N	N	Y	Y
Multi-Family Residential	N	N	Y	N	N	Y	Y
	Commercial Zoning Districts						
	Regional District		Storage District				
	CHW		CS				
Artist Studio with Residence	AP		N				
Caretaker Residence	AP		AP				
Group Home (6 or less)	N		N				
Residential Care Facility (7 or more)	N		N				
Residential Historic Landmark Building	*		*				
Senior Housing	N		N				
Handicapped Housing	N		N				
Special Group Housing	C		N				
Single-Family Residential	N		N				
Multi-Family Residential	N		N				

Senior housing is also conditionally permitted in commercial zoning districts of general applicability in which multi-family housing is permitted. In particular, Table 3 shows that R-4-N (high density, multifamily residential) housing and R-4-R (moderate density, multifamily residential) housing is permitted while senior housing in the same districts is conditionally permitted.

Table 3. Commercial Zoning Districts of General Applicability

	Commercial Districts		
	CO	CH	CT
Housing (c) R-3-T	Y	N	N
R-4-N	Y	N	Y
R-4-R	Y	N	Y
Active Senior Housing	C	N	C
Traditional Senior Housing	C	N	C
Other Special Group Housing	C	N	C
Caretaker Residence	AP	AP	AP

Proposed Action: Senior Citizen Housing should be clearly defined and separate from the definition of Special Group Residential within the Zoning Code and listed under appropriate zoning classifications so that it is treated identically to Multi-Family Dwelling within the R-4 residential zoning districts.

Summary

The House Committee Report accompanying the Fair Housing Act as amended in 1988 (FHAA) stated that the Act was “intended to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of (the disabled) to live in the residence of their choice in the community.” (H.R. Rep. No. 100-711, 100th Cong., 2nd Sess. 24, 1988). Seniors are protected by the FHAA if they “(1) have a physical or mental impairment which substantially limits one or more of such person’s major life activities, (2) a record of having such an impairment, or (3) being regarded as having such an impairment.” One court has specifically held that, since the elderly as a group are “regarded as disabled,” they are covered by the FHAA (*Casa Marie, Inc. v. Superior Court of P.R.*, 752 F. Supp. 1152, 1168 (D.P.R. 1990) (Clearinghouse No. 46, 262)).

The FHAA under “Discrimination in Residential Real Estate-Related Transactions,” Section 807 defines “housing for older persons” as housing (A) provided under any State or Federal program that the Secretary determines is specifically designed and operated to assist elderly persons (as defined in the State or Federal program); or (B) intended for, and solely occupied by, persons 62 years of age or older; or (C) intended and operated for occupancy by at least one person 55 years of age or older per unit.

Thus, Senior Citizen Housing should be defined and listed under appropriate zoning classifications so that it is treated identically to standard Single-Family Residential and Multi-Family Residential.

Concerning Handicapped Housing

The Zoning Code defines handicapped housing as “any housing which is designed and physically improved to accommodate physically handicapped persons. Handicapped housing does not include residential care facility (Ord. C-6533.1 (part), 1988).

Impediment: Application of Conditional Use Permit

Current Practice: The Zoning Code distinguishes Handicapped Housing from other similar Single-Family and Multi-Family Residential uses by prohibiting handicapped housing or by the application of a conditional use permit.

Analysis: Housing for persons with disabilities is protected by law (e.g. Fair Housing Act as amended in 1988; California Assembly Bill 2244). Discrimination may occur when their housing and related services are either prohibited in zone classifications where single-family residential and multi-family residential are allowed or when housing for persons with disabilities is subjected to Special Use Permit requirements not equally imposed on other similar single-family residential or multi-family residential uses. Local governments may not require such permits unless they are required of other dwellings of similar use.

As noted in the table below, Special Group Residence - Handicapped Housing is not permitted while similar uses are permitted. In particular, single-family attached housing is permitted in all of the single-family residential zoning districts while handicapped housing is prohibited in each of the same districts.

Table 4. Use Classifications for Single-Family Residential Districts

	Single-Family Residential District					
	R-1-S	R-1-M	R-1-L	R-1-N	R-1-T	RM
Single-Family Detached	Y	Y	Y	Y	Y	Y
Single-Family Attached	N	N	N	N	Y	N
Duplex	N	N	N	N	Y(b)	N
Three-Family Dwelling	N	N	N	N	N	N
Four-Family Dwelling	N	N	N	N	N	N
Multi-Family Dwelling	N	N	N	N	N	N
Townhouse	N	N	N	N	N	N
Modular or Manufactured Housing Unit	Y	Y	Y	Y	Y	Y
Mobile Home Park	C	C	C	C	C	C
Secondary Housing Units	N	N	A	A	N	N
Special Group Residence -Senior Housing	N	N	N	N	N	N
Special Group Residence -Handicapped Housing	N	N	N	N	N	N
Special Group Residence -Residential Care Facility	N	N	N	N	N	N
Special Group Residence -Communal Housing	N	N	N	N	N	N
Special Group Residence -Convalescent Hospital	N	N	N	N	N	N

As evident in the table 5, Handicapped Housing is not permitted in two-family residential zoning districts as well. In particular, single-family attached housing, single-family detached housing, and two-family (duplex) are permitted in all of the two-family residential zoning districts while handicapped housing is prohibited in each of the same districts.

Table 5. Use Classifications for Two-Family Residential Districts

	Two-Family Residential District					
	R-2-S	R-2-I	R-2-L	R-2-N	R-2-A	
Single-Family Detached	Y	Y	Y	Y	Y	
Single-Family Attached	Y	Y	Y	Y	Y	
Duplex	Y(b)	Y	Y	Y	Y(c)	
Three-Family Dwelling	N	N	N	N	Y	
Four-Family Dwelling	N	N	N	N	N	
Multi-Family Dwelling	N	N	N	N	N	
Townhouse	N	N	N	N	Y	
Modular or Manufactured Housing Unit	Y	Y	Y	Y	N	
Mobile Home Park	C	C	C	C	C	
Secondary Housing Units	N	N	A	A	A	
Special Group Residence -Senior Housing	N	N	N	N	N	
Special Group Residence -Handicapped Housing	N	N	N	N	N	
Special Group Residence -Residential Care Facility	N	N	N	N	N	
Special Group Residence -Communal Housing	N	N	N	N	N	
Special Group Residence -Convalescent Hospital	N	N	N	N	N	

Table 6 reveals that Handicapped Housing is either not permitted or conditionally permitted in three-, four-, and multi-family residential zoning districts. In particular,

single-family attached housing, single-family detached housing, two-family (duplex), three-family dwelling, four-family dwelling, and multi-family housing is permitted in most of the zoning districts while handicapped housing is either prohibited or conditionally permitted in each of the same districts.

Table 6. Use Classifications and Three-, Four-, and Multi-Family Residential Districts

	Three-, Four-, and Multi-Family Residential Districts						
	R-3-S	R-3-4	R-3-T	R-4-R	R-4-N	R-4-H (d)	R-4-U
Single-Family Detached	Y	Y	N	Y	Y	Y	Y
Single-Family Attached	Y	Y	Y	Y	Y	Y	Y
Duplex	Y	Y	Y	Y	Y	Y	Y
Three-Family Dwelling	Y	Y	N	Y	Y	Y	Y
Four-Family Dwelling	Y	Y	N	Y	Y	Y	Y
Multi-Family Dwelling	N	N	N	Y	Y	Y	Y
Townhouse	Y	Y	Y	Y	Y	Y	Y
Modular or Manufactured Housing Unit	N	N	N	N	N	N	N
Mobile Home Park	C	C	C	C	C	C	C
Secondary Housing Units	A	A	A	A	A	A	A
Special Group Residence -Senior Housing	N	N	N	C	C	C	C
Special Group Residence -Handicapped Housing	N	N	N	C	C	C	C
Special Group Residence -Residential Care Facility	N	N	N	C	C	C	C
Special Group Residence -Communal Housing	N	N	N	C	C	C	C
Special Group Residence -Convalescent Hospital	N	N	N	C	C	C	C

Handicapped Housing is either not permitted or conditionally permitted in commercial zoning districts as well. Table 7 is a summary of table 2 that only includes handicapped housing and single-family residential and multi-family residential housing. Table 2 reveals that handicapped housing is not permitted in the CNR district while single-family and multi-family residential housing is. Also, handicapped housing is conditionally permitted in the CCR and CCN zoning districts while single-family and multi-family residential housing is permitted by right.

Table 7. Commercial Zoning Districts: Neighborhood and Community

	Commercial Zoning Districts						
	Neighborhood Districts			Community Districts			
	CNP	CNA	CNR	CCA	CCP	CCR	CCN
Handicapped Housing	N	N	N	N	N	C	C
Single-Family Residential	N	N	Y	N	N	Y	Y
Multi-Family Residential	N	N	Y	N	N	Y	Y

Table 8 is exactly the same as table 3 above which reveals that handicapped housing is not listed among the residential uses within the commercial zoning districts of general applicability. As a result, it is assumed that handicapped housing is prohibited (unless assumed under Other Special Group Housing) while R-3-T ("a district that permits a townhouse or row house residential district on small (especially shallow) lots"), R-4-N (high density, multifamily residential) housing and R-4-R (moderate density, multifamily residential) housing is permitted.

Table 8. Commercial Zoning Districts of General Applicability

	Commercial Districts		
	CO	CH	CT
Housing (c) R-3-T	Y	N	N
R-4-N	Y	N	Y
R-4-R	Y	N	Y
Active Senior Housing	C	N	C
Traditional Senior Housing	C	N	C
Other Special Group Housing	C	N	C
Caretaker Residence	AP	AP	AP

Proposed Action: Handicapped Housing should be more clearly defined and separate from the definition of Special Group Residential within the Zoning Code and listed under appropriate zoning classifications so that it is treated identically to other Single-family Residential as well as Multi-Family Dwelling within the R-4 residential zoning districts.

Summary

The House Committee Report accompanying the Fair Housing Act as amended in 1988 (FHAA) stated that the Act was “intended to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of (the disabled) to live in the residence of their choice in the community.” (H.R. Rep. No. 100-711, 100th Cong., 2nd Sess. 24, 1988).

The definition of handicapped (disability) contained in the Fair Housing Act as amended in 1988 is as follows: “Disability means, with respect to a persons (1) a physical or mental impairment which substantially limits one or more of such person’s major life activities, (2) a record of having such impairment, or (3) being regarded as having such impairment, but such term does not include current, illegal use of or addiction to a controlled substance.” It is recommended that this definition of disability be added into the zoning code.

Concerning Social Service Office (without food distribution)

Impediment: Social Service Office (without food distribution) and the Application of Special Use Permits

Current Practice: The use classification of Social Service Office (without food distribution) is used to require non-profit organizations to apply for a Conditional Use Permit (CUP) for offices for business transactions and service provision while other type of organizations (for-profit organizations) are not so required.

Analysis: The result is that all persons, including protected classes of persons, and the non-profit agencies that serve them are subjected to disparate treatment and institutional bias.

Proposed Action: the use classification of Social Service Office (without food distribution) and the use classification Professional Services should be treated identically.

Summary

An office is defined as "a place where business is transacted or a service is provided, with an emphasis on record keeping, clerical and administrative activities. (Ord. C-6533 § 1 (part), 1988). Currently, non-profit organizations have to apply for a CUP for a Social Service Office (without food distribution) for business transactions and service provision while for-profit organizations are not so required as noted in tables 9 and 10 below.

Table 9. Commercial Zoning Districts

	Commercial Zoning Districts						
	Neighborhood Districts			Community Districts			
	CNP	CNA	CNR	CCA	CCP	CCR	CCN
Professional Services*	Y	Y	Y	Y	Y	Y	Y
Social Service Office (without food dist)	AP	AP	AP	AP	AP	AP	AP
	Commercial Zoning Districts						
	Regional District		Storage District				
	CHW		CS				
Professional Services	Y		N				
Social Service Office (without food dist)	AP		AP				

*includes accounting, advertising, architecture, artist studio, bookkeeping, business headquarters, chiropractic, computer programming, consulting, contracting, dentistry, engineering, insurance, law, marketing, medicine, photography, psychiatry, psychology, real estate, or tax preparation.

Table 10. Commercial Zoning Districts of General Applicability

	Commercial Districts		
	CO	CH	CT
Professional Services	Y	Y	Y
Social Service Office (without food dist)	C	Y	N

As noted above, federal and state fair housing law refers to denials of conditional or special use permits as examples of possible discriminatory practices. The application of special requirements through land-use regulations have the effect of limiting the ability of protected classes of people, such as persons with disabilities, to live in the residence of their choice in the community. In addition, Title II of the Americans With Disabilities Act (ADA), 42 U.S.C. Sections 12131 - 12134 applies to all zoning activities undertaken by public entities. The anti-discrimination provision in Title II employs expansive language intended to reach all actions taken by public entities; it states as follows: "(N)o qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by such entity."

B. Additional Recommendations

In addition, there are other recommendations to ensure equal opportunity of housing choice for all persons including those persons protected by law under the classifications of disabilities and familial status. These recommendations include 1) adding a definition of emergency shelter and classifying and treating this use classification identically with other similar uses (e.g. hotels/motels) in the Zoning Code; and 2) adding a definition of transitional housing and classifying and treating this use classification identically with other similar uses (e.g. multi-family dwellings) in the Zoning Code.

Concerning Emergency Shelter

Impediment: Zoning Code does not indicate if Emergency Shelter is treated identically to other similar uses.

Current Practice: The Zoning Code does not define or incorporate emergency shelter as a use classification in existing zones.

Analysis: Adding a definition of emergency shelter and designating it as a use classification supports the state legislative intent concerning the provision of emergency shelters found in Government Code Section 65008.

Proposed Action: The Zoning Code should be amended to include a definition of emergency shelter and be incorporated as a use classification and treated similar to other use classifications with similar characteristics.

Summary

There are other types of housing, in which protected classes of people, including persons with disabilities and adults with children under 18 years (familial status), are more likely than other persons to live with unrelated persons, that are not included in the Zoning Code. One such housing type is emergency shelter.

It is recommended that emergency shelter be defined and incorporated as a use classification with the Zoning Code. Such a definition should be consistent with the definition used by the Department of Housing and Urban Development. HUD's definition includes the idea that emergency shelters provides overnight shelter and fulfills a resident's basic needs (i.e., food, clothing, medical care), either on-site or through off-site services. An emergency shelter provides case management which links clients to the City's continuum of care including support services. Clients usually move into transitional housing after their stay but, when appropriate, may move into service-enriched or independent-living affordable housing. Emergency shelters include short-term facilities such as cold weather shelters (one day at a time) and hotels, motels, or other similar facilities that provide temporary residence (up to seven days) by accepting vouchers, certificates, or coupons that can be redeemed by low income individuals or families for temporary residence.

Adding a definition supports the state legislative intent concerning emergency shelters. In 1984 the State Legislature amended Government Code Section 65008 to include emergency shelters. It expressed the following legislative intent:

“The Legislature finds and declares that because of economic, physical, and mental conditions that are beyond their control, thousands of individuals and families in California are homeless. Churches, local governments, and nonprofit organizations providing assistance to the homeless have been overwhelmed by a new class of homeless; families with children, individuals with employable skills, and formerly middle-class families and individuals with long work histories.

The programs provided by the state, local, and federal governments, and by private institutions, have been unable to meet existing needs and further action is necessary. The Legislature finds and declares that two levels of housing assistance are needed: an emergency fund to supplement temporary housing and the creation of new housing units affordable to very low-income households. It is in the public interest for the State of California to provide this assistance.

The Legislature further finds and declares that there is a need for more information on the numbers of homeless and the causes of homelessness, and for systematic exploration of more comprehensive solutions to the problem. Both local and state government have a role to play in identifying, understanding, and devising solutions to the problem of homelessness.”

Concerning Transitional Housing

Impediment: Zoning Code does not indicate if Transitional Housing is treated identically to other similar uses.

Current Practice: The Zoning Code does not define or incorporate transitional housing as a use classification in existing zones.

Analysis: Adding a definition of transitional housing and designating it as a use classification supports the Department of Housing and Urban Development’s intent to link individuals and families staying in emergency shelters to transitional housing for further supportive social services.

Proposed Action: The Zoning Code should be amended to include a definition of transitional housing and be incorporated as a use classification and treated identically to similar single-family residential and multi-family residential uses.

Summary

It is recommended that a definition of transitional housing be consistent with the definition used by the Department of Housing and Urban Development. HUD notes that such housing is a facility that provides housing for up to 2 years. In addition, residents are linked to a high level of rehabilitative services which include substance abuse and

mental health care interventions, employment services, individual and group counseling and life skills training designed to prepare clients for supportive permanent affordable housing or independent-living permanent affordable housing.

It is also recommended that transitional housing be treated identically to standard single-family residential and multi-family residential. As noted above in section B Special Use Permits, federal and state fair housing law refers to denials of conditional or special use permits as examples of possible discriminatory practices. The application of special requirements through land-use regulations have the effect of limiting the ability of protected classes of people, such as persons with disabilities, to live in the residence of their choice in the community. In addition, Title II of the Americans With Disabilities Act (ADA), 42 U.S.C. Sections 12131 - 12134 applies to all zoning activities undertaken by public entities. The anti-discrimination provision in Title II employs expansive language intended to reach all actions taken by public entities; it states as follows: “(N)o qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by such entity.”

G. Accessibility of Housing to People with Disabilities

People with disabilities are entitled to the same range of choices of neighborhoods and styles of housing that other housing consumers enjoy. To reach this goal, zoning, architectural and attitudinal barriers must be eliminated.

The Fair Housing Amendment Act of 1988 expanded coverage of Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act) to prohibit discriminatory housing practices based on “handicap” and familial status. The Act requires housing providers to make reasonable accommodations, which are changes in the “rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.” A simple example of a reasonable accommodation would be to waive a “no pet” policy for a person who is visually impaired and lives with a guide dog. The Act also requires housing providers to allow a tenant to make reasonable modifications to their housing unit. These modifications are made at the tenants expense when such accommodations are necessary to afford such a person equal opportunity to use and enjoy that dwelling. A housing provider may require a tenant to escrow the cost of returning property to its original condition if the modifications to be made would interfere with a future tenant’s use and enjoyment of the premises, and a housing provider may require alterations to be made by a certified contractor. A simple example of a modification would be to allow a tenant to build a ramp or widen the doorways for wheelchair access.

A disability is defined under the Fair Housing Act as a physical or mental impairment, which substantially limits one or more of such person’s major life activities. Included within this protected class are also persons who have a record of having a disability or are perceived to have a disability. The Act provides protection to people recovering from alcohol or drug addiction and persons living with HIV or AIDS. It does not include current, illegal use of a controlled substance or any individual who poses a “direct threat to the health or safety of others individuals or whose tenancy would result in substantial physical damage to the property of others.”

Protection provided for persons with disabilities are unique to those provided for other protected classes under the Fair Housing Act in that the provisions actually call for affirmative actions to be taken by housing providers, municipalities and other in removing barriers to fair housing choice for people with disabilities. Congress believed that the accessibility provisions of the Act would: 1) facilitate the ability of persons with disabilities to enjoy full use of their homes without imposing unreasonable requirements on homebuilders, landlords and non-tenants; 2) be essential for equal access and to avoid future de facto exclusions of persons with disabilities; and 3) be easy to incorporate in housing design and construction.

In 1999, The City of Long Beach adopted an ordinance (Ord. C-7639) incorporating provisions to provide people with disabilities reasonable accommodations in rules, policies, practices and procedures that may be necessary to ensure equal access to housing. The ordinance “provides a process for individuals with disabilities to make

requests for reasonable accommodations in regard to relief from the various land use, zoning, or building laws, rules, policies, practices and/or procedures of the City” that may serve as barriers to equal access to housing.

1) Distinguishing Between the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA) Concerning Accessibility

The Fair Housing Act (FHA) should not be confused with the Americans with Disabilities Act (ADA) in regards to accessibility for persons with disabilities. The ADA covers activities of state and local governments and the buildings in which they operate and public accommodations such as movie theaters, hotels, and restaurants. The FHA applies residential dwellings including public, private and assisted (subsidized) housing. As a result, builders and developers often believe that if they are meeting the guidelines of the ADA then they have fulfilled all their responsibilities in regards to accessibility for persons with disabilities. This is not necessarily true.

Under the FHA, the accessibility provisions apply to the following types of housing:

1. New buildings designed for first occupancy after March 13, 1991;
2. All housing, including privately financed housing;
3. Buildings with four or more units;
4. All units in elevator buildings; ground floor units in non-elevator buildings;
5. Single-story townhouses/patio homes;
6. Timeshares; dormitories; residential homeless shelters;
7. Existing buildings with additions of four or more units.

Under the FHA, buildings covered by the law must comply with the following requirements:

1. The building entrance must be on an accessible route;
2. All public and common use areas of the building must be accessible;
3. All the doors must be designed sufficiently wide to allow passage by wheelchair users into and within the premises;
4. There must be an accessible route into and through the dwelling unit;
5. Light switches and other environmental controls must be located in accessible locations;
6. Reinforcements in bathroom walls are required to allow later installation of grab bars;
7. Kitchen and bathrooms must be designed so that an individual in a wheelchair can maneuver about the space.

While the ADA does not generally apply to residential housing, certain ADA issues arise with the accessibility of common use areas in residential developments if the facilities are open to persons other than owners, residents, and their guests. Examples include: sales and rental offices, sales areas in model homes, pools and clubs open to the general public, and reception rooms that can be rented to non-residents.

The City of Long Beach and the Fair Housing Foundation should obtain a copy of The Fair Housing Act Design Manual: A Manual to Assist Designers and Builders in Meeting the Accessibility Requirements of the Fair Housing Act, published by the U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity, by contacting the HUD Distribution Center at (800) 767-7468. Request a copy of publication HUD-1733-FHEO Revised April 1998.

2) Compliance with Accessibility Requirements

The HUD Offices of Fair Housing and Equal Opportunity and the Community Planning and Development Department recently issued a joint notice urging federal grant recipient jurisdictions to examine compliance with the accessibility requirements of the Fair Housing Act by both public and private housing providers. HUD has called upon jurisdictions in their AI study to review their building codes to determine if they have incorporated accessibility requirements of Section 504, the Fair Housing Act, Title II of the ADA, etc. for both multifamily and single family housing.

In January 2001, HUD officially endorsed a new building code document that clarifies the federal Fair Housing Accessibility Guidelines for planners and builders to ensure that new multifamily housing developments are accessible to people with disabilities. The “Code Requirements for Housing Accessibility” (CRHA) published by the International Code Council (ICC) clearly communicates in building code language the federal multifamily construction accessibility requirements contained in the Fair Housing Act. The CRHA was designed to enable local jurisdictions to adopt these codes and enforce provisions that are at least equivalent to the Act’s requirements through their routine code enforcement activities.

A review of the City of Long Beach Municipal Code found no reference to the accessibility requirements contained in the Fair Housing Act and other applicable documents. Nor does the City have any provisions for ensuring that new housing construction meets any accessibility requirements contained in state and federal law. It is quite possible that City staff is inadvertently approving plans without ensuring compliance with fair housing laws, and thus contributing to compliance problems.

The City of Long Beach should adopt the ICC Code Requirements for Housing Accessibility (CHRA) as part of its planning and zoning code requirements. The Accessibility guidelines provided in the CHRA should be spelled out completely and not just referenced in the code in order to provide guidance to all planners and builders seeking approvals and permits from the City. Having building code requirements consistent with the accessibility requirements of the Fair Housing Act will significantly increase the amount of accessible multifamily housing available in the City.

3) Visitability in Housing

VisitAbility is a HUD endorsed movement to enhance the user-friendliness of all housing to include the needs of everyone, regardless of their physical abilities. Visitability allows mobility-impaired individuals to visit families and friends where this might otherwise not be possible. Homes in the community can welcome guests who use wheelchairs or walkers, or have some other form of mobility impairment. A visitable home also serves persons without disabilities such as a mother pushing a stroller or a person delivering a large appliance. Residents are more likely to be able to remain in their homes as they age and make difficult times of aging, accident or illness less trying.

Most homes have steps at every entrance, and have bathroom doors that are narrower than other interior passage doors. Visitability encourages housing designed with:

- At least one entrance with a no step entryway;
- 32 inch clear passage through all interior doors, hallways and passageways (including bathrooms)
- at least one bath on the main floor accessibly designed (including reinforcement built into the walls to accommodate grab bars)

There is presently an active movement nationwide to encourage local jurisdictions to incorporate “Visitability” concepts into their planning and building practices. A number of communities nationwide have adopted a “Visitability Ordinance” calling for new housing construction that uses public financial assistance to meet minimal visitability standards. The City of Long Beach should explore adopting such an ordinance.

H. Fair Housing and Lead-Based Paint

The City of Long Beach has approximately 170,388 housing units of which nearly 39% (66,000) were constructed before 1950. Lead-based paint containing up to 50% lead was in common use through the 1940s. Although the use and manufacture of interior lead-based paint declined during the 1950s, exterior lead-based paint and some interior lead-based paint continued to be available until the mid 1970s when Congress banned it in 1978. Lead-based paint is still available for industrial, military, and marine use and occasionally ends up being used in homes.

The City has noted in its 2000-2005 Consolidated Plan submission, that about half of its pre-1950 housing units are located in low- or very low income census tracts. This housing is characterized by renter-occupied units in poor condition including deteriorating interior and exterior paint on walls and surfaces, mold and mildew, wall openings, leaking roofs, malfunctioning heaters, and unsafe windows. An estimated 30,000 residential units in low- and very low-income housing census tracts are poorly maintained and have extensive environmental hazards.

The issue of lead-based paint in housing is recognized as a fair housing concern because of the overconcentration of housing containing lead-based paint in low- or very low-income neighborhoods coupled with the over-representation of protected class groups residing in these neighborhoods. As noted above, more than half of the pre-1950 housing units in the City of Long Beach are concentrated in low-income neighborhoods all of which have a high concentration of protected class individuals particularly African American, Latino, Asian and families with children particularly those headed by single females.

Children under the age of six are particularly vulnerable to lead poisoning both because they are more likely to ingest lead in housing situations and because ingested lead can adversely affect the development of children's brains, central nervous systems, and other organ systems. Recent studies have shown that simply breathing dust particles that are in the air because of the opening and closing of lead-based painted windows can be just as hazardous as the "ingestion" of lead paint. Nearly five percent, almost 1 million, American children ages 1 to 5 suffer from lead poisoning. The rates are much higher among low-income children and African American children living in older housing.

The importance of this issue has raised questions concerning lead-based paint and the requirements of the Fair Housing Act, particularly as it relates to rental housing for families with children.

First, it is illegal under the Fair Housing Act to not rent to families with children, unless the landlord is otherwise exempt for instance, as housing for older persons. Case law has stated that a landlord cannot discourage a potential tenant or determine for them that a property is safe or unsafe for their children. Examples include: steep stairways, steep balconies, busy streets and the presence of dangerous equipment. Case law has

determined that it is up to the parent to determine if a situation is appropriate for their children, not for the landlord to make that determination for them. The presence of lead based paint is a similar situation.

If a unit has not undergone lead hazard control treatments, the housing provider must advise the family of the condition of the unit (see section 1018 of the Residential Lead-Based Paint Hazard Reduction Act of 1992), but may not decline to allow the family to occupy the unit because the family has children. It would also violate the Fair Housing Act for a housing provider to seek to terminate the tenancy of a family residing in a unit where lead-based paint hazards have not been controlled against the family's wishes because of the presence of children in the household.

A housing provider may affirmatively market units where lead-based paint hazards have been removed to families with children. In addition, if a landlord has removed the lead-based paint hazards from certain apartments, those apartments can be set-aside specifically for families with children. It is recommended that if the housing provider plans to use this method, that the units chosen for lead-based paint removal be distributed throughout the complex and not segregated to one building or area of the complex.

Since 1995, the City's Department of Health and Human Services has received \$8 million in grants to address potential lead-based paint hazards. The City's strategy is designed around the following five-point program: (1) a community education and awareness program; (2) blood testing for young children in families below 200% of the poverty line; (3) housing and environmental inspections; (4) grants and loans for repairs; and (5) a monitoring program. In April 1998, the City initiated a program called the Long Beach Lead-Safe Affordable Housing Program. The program was designed to assess and control lead-based paint hazards in owner-occupied and renter-occupied housing. Approximately 150 units of pre-1950 affordable housing with at-risk populations (children under 6 years of age) were addressed during the 1999-2000 program year.

I. Public Housing and Housing Assistance in the City of Long Beach

The availability and location of public and assisted housing may be a fair housing concern. If such housing is concentrated in one area of a community, a household seeking affordable housing is limited to choices within the area. Public/assisted housing and housing assistance must be accessible to qualified households regardless of race/ethnicity, disability, or other special characteristics. This section addresses only key housing programs administered within the City of Long Beach.

The City of Long Beach offers housing assistance through the Long Beach Housing Authority in the form of Section 8 vouchers. Section 8 is a rent subsidy program that helps very low-income families and seniors pay rent to private landlords. Section 8 tenants pay a minimum of 30% of their income for rent and the City of Long Beach pays the difference up to the payment standard established by HUD. The program offers very low-income households the opportunity to obtain affordable, privately owned rental housing and to increase their housing choices. The City of Long Beach establishes payment standards based on HUD established Fair Market Rents. The owner's asking price must be supported by comparable rents in the area. The program participant pays any amount in the excess of the payment standard.

Section 8 Vouchers

6,150 households receive Section 8 assistance from the City of Long Beach Housing Authority. Among the recipients, less than 1% are American Indian/Alaskan Native or Native Hawaiian/Other Pacific Islander, 3% declined to state their race, 23% Asian, 23% White, and 50% Black/African American.

Section 8 Vouchers by Unit Size			Section 8 Vouchers Participant Income		
Unit Size	Section 8 Households	Percentage	Annual Income	Households	Percentage
0 - Bedroom	24	.39	\$0 – \$15,000	4351	70.75
1 – Bedroom	1927	31.33	\$15,001 - \$30,000	1720	27.97
2 – Bedroom	2345	38.13	\$30,001 - \$45,000	75	1.22
3 – Bedroom	1481	24.08	\$45,001>	4	.07
4 – Bedroom	311	5.06			
5 – Bedroom	53	.86			
6 – Bedroom	9	.15			

Since the demand for housing assistance often exceeds the limited resources available, long waiting periods are common. The Housing Authority of the City of Long Beach currently has a waiting list of 17,475 applicants. The amount of time spent of the waiting list often varies and can be very long. These wait times can disproportionately impact the elderly, who may be frail and have health problems. Unfortunately, some elderly residents on the waiting list may not live long enough to receive assistance.

Another critical issue is the increasing lack of interest of landlords to participate in the Section 8 program. Given the very tight housing market, many rental properties have no problem renting out units at market rates, which continue to rise. Include in this the very stringent Housing Quality Standards that must accompany Section 8 assisted households and the financial incentives to participate in the Section 8 program are less attractive in a very tight housing market than in a housing market with high vacancy rates.

Public Housing Projects

The City of Long Beach does not own and/or manages and public developments; however, the Housing Authority of the County of Los Angeles (HACoLA) owns and manages the Carmelitos Housing Development located within the City of Long Beach. There 713 units in the development. 558 of these units are family units and the remaining 155 are Senior/Disabled units. There are less than 1% American Indian, 4% Asian, 7% White, 28% Latino and 61% Black currently residing within the Carmelitos Housing Development. Most residents in housing development have extremely low incomes, with 59 percent of the households having annual incomes of less than \$10,000. Many households rely on Supplemental Security Income (SSI) and Social Security for subsistence. Within the Carmelitos Housing Development 2% of the residents receive General Assistance, 4% Child Support, 2% Other Sources, 2% Pension, 3% Unemployment, 22% Wages/Employment, 25% Temporary Assistance to Needy Families (TANF) and 40% SSI/Social Security. Given that most of the majority of the residents are either elderly persons age 62 or older or children under the age of 18.

V. The Fair Housing Plan for the City of Long Beach

Equal and free access to residential housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment and other goals. Because housing choice is so critical, fair housing is a goal that government leaders, public officials and private citizens must be fully committed to if equality of opportunity is to become a reality.

The City of Long Beach is firmly committed to affirmatively furthering fair housing choice for all in our community. The U.S. Department of Housing and Urban Development requires jurisdictions receiving funding from federal housing and community development programs to certify that they will affirmatively further fair housing by:

- (1) conducting an analysis to identify impediments to fair housing choice within the jurisdiction;
- (2) taking appropriate actions to overcome the effects of any impediments identified through the analysis;
- (3) maintaining records reflecting the analysis and actions taken in this regard.

HUD provides further guidance for Fair Housing Planning that interprets those broad objectives to mean:

- Analyze and eliminate housing discrimination in the jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin;
- Promote housing that is structurally accessible to, and usable by, all persons, particularly person with disabilities;
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act as well as state and local fair housing laws.

The following outlines the City's plan to continue our efforts to affirmatively further fair housing choice over the next five years. The Fair Housing Plan outlined below is presented in two parts – a) our commitment to continue to foster compliance with federal and state fair housing laws and promote fair housing choice for all persons within the City through the provision of comprehensive fair housing services available to Long Beach consumers and housing providers and; b) our commitment to take appropriate actions to overcome the effects of any impediments identified through the analysis of impediments study.

A. FAIR HOUSING SERVICES

The City of Long Beach has an ongoing commitment to providing comprehensive fair housing education, outreach, counseling and enforcement for the benefit of housing consumers and providers. Fair Housing services to be provided under contract with The Fair Housing Foundation shall include:

- 1) Enforcement of fair housing laws through intake, investigation and processing of allegations of illegal housing discrimination complaints reported by Long Beach housing consumers.
- 2) Comprehensive counseling, information, referral and conciliation services provided to housing consumers and providers seeking assistance with both fair housing and general housing issues and concerns.
- 3) Expanded educational audit services to include a minimum of 10 random tests conducted annually. Annual audits will be structured to focus on one protected class each year.
- 4) Education and Outreach services to include certificate trainings to housing industry professionals, tenant workshops, landlord workshops, presentations, staffing of booths, paid advertisements, public service announcements and literature distribution.
- 5) Education and outreach services specifically to the Cambodian community to include fair housing workshops, paid advertisements, public service announcements and literature distribution
- 6) Provide education, training and outreach regarding Fair Housing Laws and issues of cultural sensitivity for local realtors, rental property owners, managers, and agents.
- 7) Conduct a Habitability Program to assist housing consumers in getting repairs made through case intake, counseling and documentation.
- 8) Mediations of general housing complaints between owner/landlord and tenant.
- 9) Expand FHF Client Intake Form to include information on whether clients are seniors and/or disabled.
- 10) Track and review, on a periodic basis, all general housing complaints (such as substandard conditions, harassment, etc.) for patterns that may demonstrate fair housing implications.
- 11) Review on an annual basis any recurring and flagrant problems related to fair housing and suggest appropriate responses.

B. EFFORTS TO IDENTIFY AND ELIMINATE IMPEDIMENTS TO FAIR HOUSING CHOICE IN THE CITY OF LONG BEACH

In addition to providing fair housing enforcement and education services, The City of Long Beach shall work with its fair housing service provider (The Fair Housing Foundation), as well as other interested parties in the community, to identify additional resources in order to take actions to overcome the effects of any impediments identified through this analysis of impediments study. Based on the finding and recommendations contained in this analysis of impediments study, the City of Long Beach shall conduct the following activities over the next five years.

1. Investigate Housing Segregation Patterns within the eastern part of the City

- Conduct in-depth audit testing of housing practices within the rental and sales markets focused on the area containing the 17 census tracts with more than 75% white residents to identify potential violations of fair housing laws.
- Conduct an in-depth examination and analysis of Home Mortgage Disclosure Act Data available on potential borrowers collected over the last 10 years within the area containing the same 17 census tracts to identify potential violations of fair housing laws.
- Work with the City Attorney's office and the Department of Housing and Urban Development to follow-up on findings that suggest potential violations of fair housing laws and pursue available enforcement actions.

2. Investigate and Address Evidence of Differential Treatment Faced by African Americans in the Rental Housing Market

- Conduct citywide random audits of rental vacancies to identify potential violations of fair housing laws.
- Conduct interviews with a sampling of African American clients served by the Fair Housing Foundation to identify pattern and practice
- Work with the City Attorney's office and the Department of Housing and Urban Development to follow-up on findings that suggest potential violations of fair housing laws and pursue available remedies including enforcement actions.
- Develop special promotional campaign to discourage discriminatory practices

3. Examine and Address Housing Challenges Specifically Faced by Female Headed Households in the Rental Housing Market

- Conduct interviews with a sampling of clients from female-headed households served by the Fair Housing Foundation to identify pattern and practice.

- Conduct focus groups with women from female-headed households, including single women with children to identify issues and concerns specific to this population.
- Analyze the results of interview and focus groups and work with the Fair Housing Foundation and other community organizations to develop a strategy to address issues and concerns specific to this population.

4. Expand Promotion of Fair Housing Choice for All in the Long Beach Housing Market

- Promote fair housing information and services on the City's public access channel through PSA's, video presentations and other available opportunities.
- Provide Fair Housing information on the City's official website and provide a link to the Fair Housing Foundation site. Create a consolidated housing information section on the City's website.
- Work with the Fair Housing Foundation along with the Neighborhood Resources Center and other appropriate organization on an expanded education and outreach effort to promote Fair Housing issues, concerns and activities.
- Work with organizations specifically serving the Latino and Asian communities in the city and other appropriate groups to conduct a citywide promotional campaign in several languages to inform housing providers and consumers about the rights and obligations under state and federal fair housing laws
- Work with the Fair Housing Foundation and other appropriate organizations to conduct a citywide education and outreach campaign to promote greater awareness amongst housing consumers and providers about rights and obligations under fair housing laws as they relate to families with children and people with disabilities.

5. Home Mortgage Financing Issues

- Conduct a detailed examination and analysis of home mortgage lending patterns and practices within the City to determine if there is a pattern and practice of discriminatory lending and/or redlining taking place in the City.
- Initiate a broad-based open dialogue with representatives of lending institutions participating in the residential credit market in the City to develop strategies and programs to increase the mortgage lending awards to African American and Hispanic/Latino households purchasing in Long Beach.
- The City of Long Beach and the Fair Housing Foundation should establish a "No Tolerance of Predatory Lending" educational campaign. The campaign should provide suggestions to help homeowners avoid getting trapped into a predatory loan and provide information about "how to look for the right loan."

6. Revisions to the Zoning Code

- Present the findings and recommendations contained within this Analysis of Impediment study to City Zoning officials for review and appropriate action.
- Work with City Zoning officials to amend the zoning code based on the recommendations in this study to ensure compliance with applicable Fair Housing laws.

7. Accessible Housing for People with Disabilities

- Present the findings and recommendations contained within this AI study to City Planning and Building officials for review and appropriate action.
- Work with City Planning and Building officials to incorporate Fair Housing accessibility guidelines into all applicable planning, building and zoning codes.
- Work with City Planning and Building officials to review the residential building plan approval process and ensure that accessibility requirements are included in the plan check process and that staff is properly trained to apply these requirements.
- Work with appropriate organizations to conduct a more comprehensive review of specific issues and concerns affecting fair housing choice for people with disabilities in the City of Long Beach.
- Conduct an inventory of all housing stock covered by the 1988 amendments to the Fair Housing Act to review compliance with accessibility guidelines.
- Work with the City Attorney's office and the Department of Housing and Urban Development to follow-up on findings from the inventory that suggest potential violations of fair housing laws and pursue available remedies including enforcement actions when appropriate.

8. Document and Maintain Records of Efforts to Affirmatively Further Fair Housing in the City of Long Beach

- Collect and analyze relevant data on City housing and community development programs to determine whether program recipients, especially protected class groups, receive a fair share of benefits and whether housing subsidies are appropriately dispersed throughout the jurisdiction.
- Work with the Fair Housing Foundation to document and maintain records of all actions taken by the City to address and overcome to the effects of any impediments identified through the Analysis of Impediments study.

SUMMARY OF AI IMPEDIMENTS AND ACCOMPLISHMENTS

Name of Grantee: City of Long Beach

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
B. Jurisdictional Profile								
Finding 1: While Whites make up 33.1% of the total population of the City, the eastern part of the city contains 17 census tracts in which Whites make up at least 75% of the total population of each census tract.	Investigate Housing Segregation Patterns within the eastern part of the City.	Conduct 17 in-depth audits of housing practices in the 17 census tracts to identify potential violations of fair housing laws. Follow-up on findings that suggest potential violations and pursue available enforcement actions	Fair Housing Foundation of Long Beach (FHF) FHF, City Attorney's office and HUD	2002/2003 2003/2004	\$1,500 per year to FHF	Ongoing Ongoing	2002/2003 2003/2004	N/A N/A

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
C. Current Fair Housing Profile Finding 1: Black/African American households face a disproportionate number of fair housing issues in the City of Long Beach. Representing 14.5% of the population, while reporting 36.7% of housing complaints and 45% of housing discrimination complaints filed.	Investigate and address evidence of differential treatment faced by African Americans in the Rental Housing Market	Conduct 20 citywide random audits of rental vacancies to identify potential violations of fair housing laws. Conduct interviews with a sampling of African American clients served by FHF to identify pattern and practice. Follow-up on findings that suggest potential violations and pursue available enforcement actions	FHF FHF FHF, City Attorney's office and HUD	2002/2003 2003/2004 2004/2005	\$1,800 per year to FHF	Ongoing Ongoing Ongoing	2002/2004 2003/2004 2004/2005	N/A N/A N/A

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
C. Current Fair Housing Profile								
Finding 2: Based on client data collected by the Fair Housing Foundation, female-headed households face a disproportionate number of housing issues.	Develop special promotion campaign to discourage discriminatory practices. Examine and address housing challenges specifically faced by Female Headed Households in the rental Housing Market.	Develop interview and focus group protocol, methodology, and tools	FHF	2002/2003	\$800 per year to FHF	Ongoing	2002/2003	N/A
		Conduct interviews with a sampling of clients from female-headed households served by FHF to identify pattern and practice	FHF	2003/2004		Ongoing	2003/2004	N/A
		Analyze results of interview and focus groups and work the FHF and other community organizations to develop a strategy to address issues and concerns specific to this population	FHF	2003/2004		Ongoing	2003/2004	N/A

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
C. Current Fair Housing Profile Finding 3: Based on client data collected by the Fair Housing Foundation, Asian and Hispanic/Latino households are under represented.	Expand Promotion of fair housing choice for all in the Long Beach Housing Market.	Promote fair housing information and services on the City's public access channel through PSA's, and video presentations. Provide fair housing information on the City's official website. Develop and distribute English, Spanish and Khmer fair housing literature making clear that discrimination is not only race but national original and familial status	FHF and the City of Long Beach FHF and the City of Long Beach FHF	2002/2003, 2003/2004, and 2004/2005 2002/2003, 2003/2004, and 2004/2005 2002/2003, 2003/2004, and 2004/2005	\$900 per year to FHF	Ongoing Ongoing Ongoing	2002/2003 2002/2003 2002/2003	N/A N/A N/A

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATIO N AS TO WHY AND WHEN
D. Random Audits of Housing Vacancies Finding 1: Based on random audits of rental housing conducted over the last five years, African Americans face significant obstacles to fair housing choice in the City of Long Beach		Addressed in C, Current Fair Housing Profile, Finding 1, Plan						

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
D. Random Audits of Housing Vacancies Finding 2: Based on scouting for rental vacancies and audits of rental housing, a significant number of rental vacancies are advertised only in Spanish or Khmer creating a barrier to fair housing choice for households that do not speak these languages		Addressed in C, Current Fair Housing Profile, Finding 3, Plan						

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
E. Land Use and Zoning Finding 1: The zoning Code distinguishes Senior Housing from other Single Family Residential and Multi-Family Residential uses by the application of a conditional use permit.	Revisions to the Zoning Code	Present the findings and recommendations contained within this study to City Zoning officials for review. Educate City Council and Planning & Building departments on matter and fair housing implication Organize a working group with other housing advocate groups to promote revisions to the Zoning Code	City of Long Beach, Department of Planning and Building FHF FHF	2003/2004 2003/2004 2004/2005	0 0 0	Ongoing Ongoing Ongoing	2004/2005 2004/2005 2004/2005	N/A N/A N/A

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
E. Land Use and Zoning Finding 2: The Zoning Code distinguishes Handicapped Housing from other Single-Family Residential and Multi-Family Residential uses by the application of a conditional use permit.	Revisions to the Zoning Code	Addressed in E, Land Use and Zoning, Finding 1, Plan						

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
E. Land Use and Zoning Finding 3: The use classification of Social Service Office is used to require non-profit organizations to apply for a Conditional Use permit for offices for business transactions and service provisions while other type of for-profit organizations are not so required.	Revisions to the Zoning Code	Addressed in E, Land Use and Zoning, Finding 1, Plan						

IMPEDIMENTS TO BE ADDRESSED (List by degree of importance)	GOALS (What do you hope to achieve?)	STRATEGIES TO MEET THE GOALS (How will you achieve your goals?)	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS (Identify the organizations who will be undertaking the impediment)	BENCHMARK In which year of your Con/Plan do you plan to achieve this?	PROPOSED INVESTMENT (Amount of money) (Funding Source)	YEAR TO BE COMPLETED (Is it contained in your Consolidated Plan Action Plan Goals?)	DATE COMPLETED (Identify which year of the Consolidated Plan the action was addressed)	IF THE IMPEDIMENT WAS NOT ADDRESSED, PROVIDE AN EXPLANATION AS TO WHY AND WHEN
F. Accessibility of Housing for People with Disabilities Finding 1: Presently makes no specific reference to the accessibility requirement contained in the 1988 amendment to the Fair Housing Act in its municipal code nor is there any provision monitoring compliance.	Accessible Housing for People with Disabilities	Present the findings and recommendations contained within this study to City Planning and Building officials for review Work with City Planning and Building officials to incorporate accessibility guidelines into all applicable planning, building and zoning codes Organize a working group with other housing advocate groups.	City of Long Beach FHF, Disabled Resources, Legal Aid and City of Long Beach City of Long Beach	2003/2004 2003/2004 2004/2005	0 0 0	Ongoing Ongoing Ongoing	2004/2005 2004/2005 2004/2005	N/A N/A N/A

APPENDIX A:

Home Mortgage Disclosure Act Tables

Table 1: Long Beach 2000 HMDA Mortgage Applications

by District and Census Tract

CENTRAL DISTRICT

TRACT MIDDLE OR	ALL APPLICANTS				MINORITY APPLICANTS			WHITE APPLICANTS		
	TOTAL UPPER	MINORITY INCOME	WHITE LISTED AS 'NA'	OTHER	LOW OR INCOME	MODERATE INCOME	MIDDLE OR 'NA'	UPPER INCOME	INCOME	LISTED AS
5722.01	426	205	100	121	23	170	12	15	85	0
5722.02	214	82	67	65	5	76	1	7	58	2
5730.00	288	128	70	90	26	91	11	9	47	14
5731.00	315	163	73	79	20	134	9	8	57	8
5732.01	290	180	60	50	40	131	9	9	49	2
5732.02	221	111	41	69	29	69	13	13	25	3
5751.00	405	198	115	92	44	138	16	28	78	9
5752.00	243	154	36	53	43	100	11	13	19	4
5753.00	75	42	11	22	14	27	1	0	7	4
5754.00	128	71	22	35	28	36	7	1	15	6
5758.00	229	98	75	56	24	66	8	13	42	20
5763.00	175	86	37	52	12	67	7	6	26	5
5764.00	283	154	62	67	48	89	17	13	28	21
5769.00	322	121	117	84	27	81	13	18	69	30
Sums	3,614	1,793	886	935	383	1,275	135	153	605	128
CENTRAL DISTRICT										

Table 1: Long Beach 2000 HMDA Mortgage Applications

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

DOWNTOWN DISTRICT

TRACT MIDDLE OR	ALL APPLICANTS				MINORITY APPLICANTS			WHITE APPLICANTS			
	TOTAL UPPER	MINORITY INCOME LISTED AS 'NA'	WHITE LISTED AS 'NA'	OTHER	LOW OR INCOME	MODERATE INCOME	MIDDLE OR 'NA'	UPPER INCOME	INCOME INCOME	LISTED AS	LOW OR MODERATE
5759.00	432	146	169	117	65	73	8	62	97	10	
5760.00	24	8	6	10	4	4	0	1	5	0	
5761.00	263	64	135	64	9	54	1	20	111	4	
5762.00	118	47	47	24	14	27	6	10	30	7	
Sums	837	265	357	215	92	158	15	93	243	21	
DOWNTOWN DISTRICT											

Table 1: Long Beach 2000 HMDA Mortgage Applications

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

EAST DISTRICT

TRACT MIDDLE OR	ALL APPLICANTS				MINORITY APPLICANTS			WHITE APPLICANTS			
	TOTAL UPPER	MINORITY INCOME	WHITE LISTED AS 'NA'	OTHER	LOW OR INCOME	MODERATE INCOME	MIDDLE OR 'NA'	UPPER INCOME	INCOME	LISTED AS	LOW OR MODERATE
5712.00	368	77	207	84	5	66	6	13	191	3	
5735.00	7	3	1	3	1	2	0	0	1	0	
5736.00	390	68	237	85	2	62	4	25	210	2	
5737.00	326	73	168	85	0	73	0	18	144	6	
5738.00	285	44	164	77	3	39	2	15	147	2	
5739.02	140	37	81	22	3	33	1	12	66	3	
5740.00	353	68	198	87	5	62	1	14	178	6	
5741.00	321	63	187	71	4	58	1	10	170	7	
5742.01	178	34	93	51	0	33	1	5	87	1	
5742.02	61	11	32	18	1	10	0	5	26	1	
5743.00	312	61	182	69	2	59	0	18	157	7	
5744.00	312	55	186	71	4	49	2	16	165	5	
5745.00	407	69	207	131	4	64	1	23	181	3	
5746.01	5	1	3	1	0	1	0	1	2	0	
5746.02	71	18	40	13	0	18	0	0	40	0	
5747.00	1	0	1	0	0	0	0	1	0	0	
5748.00	110	8	71	31	1	7	0	2	68	1	
5749.01	251	31	159	61	2	29	0	14	141	4	
5749.02	85	24	44	17	6	18	0	9	35	0	
5750.01	119	22	74	23	4	18	0	12	61	1	
5750.02	241	63	141	37	7	52	4	17	119	5	
5765.00	386	135	149	102	49	74	12	29	98	22	
5766.00	558	101	349	108	18	81	2	31	296	22	

Table 1: Long Beach 2000 HMDA Mortgage Applications

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

5767.00	177	23	119	35	2	21	0	7	110	2
5768.00	317	68	176	73	11	52	5	21	141	14
5770.00	309	76	169	64	20	53	3	26	129	14
5771.00	356	54	213	89	6	42	6	22	186	5
5772.00	229	27	140	62	4	21	2	12	122	6
5773.00	278	22	188	68	0	21	1	9	169	10
5774.00	187	13	139	35	0	13	0	4	131	4
5775.01	230	12	172	46	0	12	0	5	161	6
5775.02	69	4	52	13	0	4	0	2	46	4
5776.01	318	27	233	58	2	25	0	20	209	4
5776.02	163	19	102	42	2	17	0	15	85	2
5776.03	599	89	373	137	7	78	4	28	338	7
Sums	8,519	1,500	5,050	1,969	175	1,267	58	461	4,410	179
EAST DISTRICT										

Table 1: Long Beach 2000 HMDA Mortgage Applications

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

NORTH DISTRICT

TRACT MIDDLE OR	ALL APPLICANTS				MINORITY APPLICANTS			WHITE APPLICANTS			
	TOTAL UPPER	MINORITY INCOME	WHITE LISTED AS 'NA'	OTHER	LOW OR INCOME	MODERATE INCOME	MIDDLE OR 'NA'	UPPER INCOME	INCOME	LISTED AS	LOW OR MODERATE
5701.00	151	73	32	46	12	57	4	5	25	2	
5702.01	257	151	34	72	43	100	8	5	26	3	
5702.02	290	163	43	84	47	110	6	14	27	2	
5703.01	229	115	42	72	34	69	12	12	27	3	
5703.02	340	185	62	93	58	122	5	16	42	4	
5704.00	584	330	75	179	85	232	13	21	44	10	
5705.00	753	374	149	230	100	244	30	44	95	10	
5706.00	623	333	119	171	93	219	21	32	78	9	
5715.01	429	179	121	129	38	139	2	14	98	9	
5715.02	243	85	78	80	15	66	4	8	65	5	
5716.00	2	1	1	0	1	0	0	0	1	0	
5717.00	596	352	81	163	124	206	22	22	52	7	
5718.00	227	41	125	61	5	36	0	11	112	2	
5719.00	298	69	154	75	5	61	3	9	137	8	
5721.00	122	56	30	36	7	47	2	2	25	3	
5724.00	81	52	8	21	12	38	2	3	5	0	
Sums	5,225	2,559	1,154	1,512	679	1,746	134	218	859	77	
NORTH DISTRICT											

Table 1: Long Beach 2000 HMDA Mortgage Applications

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

WEST DISTRICT

TRACT MIDDLE OR	ALL APPLICANTS				MINORITY APPLICANTS			WHITE APPLICANTS				
	TOTAL UPPER	MINORITY INCOME LISTED AS 'NA'	WHITE LISTED AS 'NA'	OTHER	LOW OR INCOME	MODERATE INCOME	MIDDLE OR 'NA'	UPPER INCOME	INCOME INCOME	LISTED AS	LOW OR	MODERATE
5723.00	281	177	37	67	42	127	8	7	25	5		
5725.00	110	51	20	39	30	20	1	7	12	1		
5726.00	247	135	21	91	32	95	8	6	14	1		
5727.00	270	180	22	68	43	124	13	7	10	5		
5728.00	7	2	3	2	0	2	0	0	1	2		
5729.00	154	74	24	56	21	50	3	6	15	3		
5755.00	1	0	1	0	0	0	0	1	0	0		
5756.00	7	1	4	2	0	1	0	1	3	0		
Sums	1,077	620	132	325	168	419	33	35	80	17		
WEST DISTRICT												
Grand 6,197	Grand 422	Grand	Grand	Grand Total	19,272	6,737	7,579	4,956	1,497	4,865	375	960

NOTE: Does not include Purchased mortgages

Table 1: Long Beach 2000 HMDA Mortgage Applications

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

Table 2: Long Beach 2000 HMDA Mortgage Originations

by District and Census Tract

CENTRAL DISTRICT

RATE TRACT	ALL ORIGINATIONS				MINORITY ORIGINATIONS			WHITE ORIGINATIONS			MINORITY ORIGIN RATE			WHITE ORIGIN RATE			
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	LOW OR
5722.01	187	98	54	35	10	84	4	8	46	0	43.48%	49.41%	33.33%	53.33%	54.12%	0.00%	
5722.02	86	38	31	17	1	37	0	3	27	1	20.00%	48.68%	0.00%	42.86%	46.55%	50.00%	
5730.00	139	63	45	31	9	46	8	4	30	11	34.62%	50.55%	72.73%	44.44%	63.83%	78.57%	
5731.00	126	63	44	19	7	52	4	4	34	6	35.00%	38.81%	44.44%	50.00%	59.65%	75.00%	
5732.01	118	83	28	7	19	60	4	5	22	1	47.50%	45.80%	44.44%	55.56%	44.90%	50.00%	
5732.02	90	59	14	17	13	39	7	4	9	1	44.83%	56.52%	53.85%	30.77%	36.00%	33.33%	
5751.00	182	99	66	17	25	65	9	17	43	6	56.82%	47.10%	56.25%	60.71%	55.13%	66.67%	
5752.00	98	80	10	8	25	47	8	3	6	1	58.14%	47.00%	72.73%	23.08%	31.58%	25.00%	
5753.00	41	25	9	7	5	20	0	0	6	3	35.71%	74.07%	0.00%	0.00%	85.71%	75.00%	
5754.00	52	30	12	10	9	18	3	0	7	5	32.14%	50.00%	42.86%	0.00%	46.67%	83.33%	
5758.00	108	45	45	18	10	29	6	9	20	16	41.67%	43.94%	75.00%	69.23%	47.62%	80.00%	
5763.00	74	37	20	17	6	25	6	1	15	4	50.00%	37.31%	85.71%	16.67%	57.69%	80.00%	
5764.00	130	73	39	18	25	37	11	3	17	19	52.08%	41.57%	64.71%	23.08%	60.71%	90.48%	
5769.00	170	70	73	27	13	48	9	10	41	22	48.15%	59.26%	69.23%	55.56%	59.42%	73.33%	
Sums	1,601	863	490	248	177	607	79	71	323	96	46.21%	47.61%	58.52%	46.41%	53.39%	75.00%	
CENTRAL DISTRICT																	

Table 2: Long Beach 2000 HMDA Mortgage Originations

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

DOWNTOWN DISTRICT

TRACT	ALL ORIGINATIONS				MINORITY ORIGINATIONS			WHITE ORIGINATIONS			MINORITY ORIGIN RATE			WHITE ORIGIN RATE			
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	LOW OR
5759.00	221	91	100	30	45	42	4	36	57	7	69.23%	57.53%	50.00%	58.06%	58.76%	70.00%	
5760.00	9	4	2	3	2	2	0	0	2	0	50.00%	50.00%	0.00%	0.00%	40.00%	0.00%	
5761.00	130	28	75	27	2	26	0	12	61	2	22.22%	48.15%	0.00%	60.00%	54.95%	50.00%	
5762.00	58	16	28	14	5	9	2	4	21	3	35.71%	33.33%	33.33%	40.00%	70.00%	42.86%	
Sums	418	139	205	74	54	79	6	52	141	12	58.70%	50.00%	40.00%	55.91%	58.02%	57.14%	
DOWNTOWN DISTRICT																	

Table 2: Long Beach 2000 HMDA Mortgage Originations

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

EAST DISTRICT

RATE TRACT	ALL ORIGINATIONS				MINORITY ORIGINATIONS			WHITE ORIGINATIONS			MINORITY ORIGIN RATE			WHITE ORIGIN RATE			
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	LOW OR
5712.00	200	36	131	33	1	31	4	7	124	0	20.00%	46.97%	66.67%	53.85%	64.92%	0.00%	
5735.00	3	2	1	0	0	2	0	0	1	0	0.00%	100.00%	0.00%	0.00%	100.00%	0.00%	
5736.00	252	42	173	37	1	38	3	16	155	2	50.00%	61.29%	75.00%	64.00%	73.81%	100.00%	
5737.00	186	45	112	29	0	45	0	9	101	2	0.00%	61.64%	0.00%	50.00%	70.14%	33.33%	
5738.00	165	24	111	30	0	24	0	9	101	1	0.00%	61.54%	0.00%	60.00%	68.71%	50.00%	
5739.02	88	20	60	8	2	18	0	8	50	2	66.67%	54.55%	0.00%	66.67%	75.76%	66.67%	
5740.00	208	33	132	43	3	30	0	7	120	5	60.00%	48.39%	0.00%	50.00%	67.42%	83.33%	
5741.00	216	41	148	27	2	39	0	8	136	4	50.00%	67.24%	0.00%	80.00%	80.00%	57.14%	
5742.01	108	24	70	14	0	24	0	4	66	0	0.00%	72.73%	0.00%	80.00%	75.86%	0.00%	
5742.02	39	9	23	7	0	9	0	2	21	0	0.00%	90.00%	0.00%	40.00%	80.77%	0.00%	
5743.00	195	45	125	25	1	44	0	13	106	6	50.00%	74.58%	0.00%	72.22%	67.52%	85.71%	
5744.00	206	34	131	41	4	28	2	6	121	4	100.00%	57.14%	100.00%	37.50%	73.33%	80.00%	
5745.00	226	50	128	48	2	48	0	9	118	1	50.00%	75.00%	0.00%	39.13%	65.19%	33.33%	
5746.01	3	1	2	0	0	1	0	1	1	0	0.00%	100.00%	0.00%	100.00%	50.00%	0.00%	
5746.02	44	13	23	8	0	13	0	0	23	0	0.00%	72.22%	0.00%	0.00%	57.50%	0.00%	
5747.00	1	0	1	0	0	0	0	1	0	0	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	
5748.00	80	5	54	21	0	5	0	1	52	1	0.00%	71.43%	0.00%	50.00%	76.47%	100.00%	
5749.01	148	23	101	24	2	21	0	7	92	2	100.00%	72.41%	0.00%	50.00%	65.25%	50.00%	
5749.02	60	18	34	8	3	15	0	6	28	0	50.00%	83.33%	0.00%	66.67%	80.00%	0.00%	
5750.01	68	12	46	10	2	10	0	7	39	0	50.00%	55.56%	0.00%	58.33%	63.93%	0.00%	
5750.02	122	26	87	9	2	22	2	10	73	4	28.57%	42.31%	50.00%	58.82%	61.34%	80.00%	
5765.00	178	54	98	26	16	31	7	18	65	15	32.65%	41.89%	58.33%	62.07%	66.33%	68.18%	
5766.00	327	60	223	44	10	48	2	23	185	15	55.56%	59.26%	100.00%	74.19%	62.50%	68.18%	
5767.00	109	12	84	13	2	10	0	5	78	1	100.00%	47.62%	0.00%	71.43%	70.91%	50.00%	
5768.00	187	37	118	32	7	28	2	16	93	9	63.64%	53.85%	40.00%	76.19%	65.96%	64.29%	
5770.00	171	46	105	20	9	34	3	17	80	8	45.00%	64.15%	100.00%	65.38%	62.02%	57.14%	
5771.00	212	34	144	34	4	25	5	17	124	3	66.67%	59.52%	83.33%	77.27%	66.67%	60.00%	
5772.00	131	15	93	23	1	14	0	8	82	3	25.00%	66.67%	0.00%	66.67%	67.21%	50.00%	
5773.00	183	18	132	33	0	17	1	4	121	7	0.00%	80.95%	100.00%	44.44%	71.60%	70.00%	
5774.00	122	9	97	16	0	9	0	3	91	3	0.00%	69.23%	0.00%	75.00%	69.47%	75.00%	

Table 2: Long Beach 2000 HMDA Mortgage Originations

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

5775.01	144	7	116	21	0	7	0	1	112	3	0.00%	58.33%	0.00%	20.00%	69.57%	50.00%
5775.02	40	2	33	5	0	2	0	1	29	3	0.00%	50.00%	0.00%	50.00%	63.04%	75.00%
5776.01	208	19	160	29	2	17	0	15	142	3	100.00%	68.00%	0.00%	75.00%	67.94%	75.00%
5776.02	103	9	75	19	0	9	0	8	65	2	0.00%	52.94%	0.00%	53.33%	76.47%	100.00%
5776.03	375	62	260	53	4	55	3	19	241	0	57.14%	70.51%	75.00%	67.86%	71.30%	0.00%
Sums	5,108	887	3,431	790	80	773	34	286	3,036	109	45.71%	61.01%	58.62%	62.04%	68.84%	60.89%

EAST DISTRICT

NORTH DISTRICT

RATE	ALL ORIGINATIONS				MINORITY ORIGINATIONS			WHITE ORIGINATIONS			MINORITY ORIGINATIONS			WHITE ORIGINATIONS			LOW OR INCOME
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	
TRACT																	
5701.00	63	34	14	15	7	25	2	4	10	0	58.33%	43.86%	50.00%	80.00%	40.00%	0.00%	
5702.01	95	58	18	19	13	43	2	2	14	2	30.23%	43.00%	25.00%	40.00%	53.85%	66.67%	
5702.02	131	83	21	27	30	48	5	6	14	1	63.83%	43.64%	83.33%	42.86%	51.85%	50.00%	
5703.01	94	56	23	15	13	34	9	8	13	2	38.24%	49.28%	75.00%	66.67%	48.15%	66.67%	
5703.02	156	103	29	24	33	66	4	9	20	0	56.90%	54.10%	80.00%	56.25%	47.62%	0.00%	
5704.00	229	160	28	41	38	118	4	7	15	6	44.71%	50.86%	30.77%	33.33%	34.09%	60.00%	
5705.00	324	184	87	53	39	128	17	16	65	6	39.00%	52.46%	56.67%	36.36%	68.42%	60.00%	
5706.00	282	177	67	38	45	118	14	17	42	8	48.39%	53.88%	66.67%	53.13%	53.85%	88.89%	
5715.01	208	88	75	45	18	69	1	7	61	7	47.37%	49.64%	50.00%	50.00%	62.24%	77.78%	
5715.02	120	39	47	34	9	28	2	5	40	2	60.00%	42.42%	50.00%	62.50%	61.54%	40.00%	
5716.00	1	1	0	0	1	0	0	0	0	0	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5717.00	252	177	40	35	65	100	12	8	27	5	52.42%	48.54%	54.55%	36.36%	51.92%	71.43%	
5718.00	132	27	77	28	3	24	0	4	73	0	60.00%	66.67%	0.00%	36.36%	65.18%	0.00%	
5719.00	159	34	91	34	4	29	1	7	79	5	80.00%	47.54%	33.33%	77.78%	57.66%	62.50%	
5721.00	58	30	19	9	3	27	0	1	16	2	42.86%	57.45%	0.00%	50.00%	64.00%	66.67%	
5724.00	23	19	0	4	4	15	0	0	0	0	33.33%	39.47%	0.00%	0.00%	0.00%	0.00%	
Sums	2,327	1,270	636	421	325	872	73	101	489	46	47.86%	49.94%	54.48%	46.33%	56.93%	59.74%	

NORTH DISTRICT

Table 2: Long Beach 2000 HMDA Mortgage Originations

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

WEST DISTRICT

RATE	ALL ORIGINATIONS				MINORITY ORIGINATIONS			WHITE ORIGINATIONS			MINORITY ORIGIN RATE			WHITE ORIGIN				
	TRACT	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	LOW OR
	5723.00	106	77	15	14	18	55	4	3	8	4	42.86%	43.31%	50.00%	42.86%	32.00%	80.00%	
	5725.00	43	27	9	7	14	12	1	4	5	0	46.67%	60.00%	100.00%	57.14%	41.67%	0.00%	
	5726.00	99	72	8	19	14	53	5	1	6	1	43.75%	55.79%	62.50%	16.67%	42.86%	100.00%	
	5727.00	108	76	7	25	18	52	6	2	4	1	41.86%	41.94%	46.15%	28.57%	40.00%	20.00%	
	5728.00	1	1	0	0	0	1	0	0	0	0	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	
	5729.00	61	41	9	11	7	32	2	0	7	2	33.33%	64.00%	66.67%	0.00%	46.67%	66.67%	
	5755.00	1	0	1	0	0	0	0	1	0	0	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	
	5756.00	1	0	0	1	0	0	0	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
	Sums	420	294	49	77	71	205	18	11	30	8	42.26%	48.93%	54.55%	31.43%	37.50%	47.06%	
WEST DISTRICT																		
	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	9,874	3,453	4,811	1,610	707	2,536

Table 2: Long Beach 2000 HMDA Mortgage Originations

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

Table 3: Long Beach 2000 HMDA Mortgage Denials

by District and Census Tract

CENTRAL DISTRICT

TRACT	ALL DENIALS				MINORITY DENIALS			WHITE DENIALS			MINORITY DENIAL RATE			WHITE DENIAL RATE			LOW OR
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	
5722.01	117	57	22	38	8	42	7	3	19	0	34.78%	24.71%	58.33%	20.00%	22.35%	0.00%	
5722.02	67	16	20	31	1	15	0	1	18	1	20.00%	19.74%	0.00%	14.29%	31.03%	50.00%	
5730.00	84	31	19	34	10	19	2	4	13	2	38.46%	20.88%	18.18%	44.44%	27.66%	14.29%	
5731.00	97	55	12	30	8	45	2	0	11	1	40.00%	33.58%	22.22%	0.00%	19.30%	12.50%	
5732.01	73	52	5	16	13	38	1	0	5	0	32.50%	29.01%	11.11%	0.00%	10.20%	0.00%	
5732.02	76	29	12	35	8	17	4	1	9	2	27.59%	24.64%	30.77%	7.69%	36.00%	66.67%	
5751.00	113	44	23	46	6	36	2	5	17	1	13.64%	26.09%	12.50%	17.86%	21.79%	11.11%	
5752.00	90	42	15	33	7	32	3	5	9	1	16.28%	32.00%	27.27%	38.46%	47.37%	25.00%	
5753.00	18	11	0	7	7	3	1	0	0	0	50.00%	11.11%	100.00%	0.00%	0.00%	0.00%	
5754.00	42	20	8	14	9	9	2	1	6	1	32.14%	25.00%	28.57%	100.00%	40.00%	16.67%	
5758.00	71	29	16	26	4	23	2	4	8	4	16.67%	34.85%	25.00%	30.77%	19.05%	20.00%	
5763.00	52	21	10	21	2	18	1	2	7	1	16.67%	26.87%	14.29%	33.33%	26.92%	20.00%	
5764.00	74	43	10	21	14	23	6	5	4	1	29.17%	25.84%	35.29%	38.46%	14.29%	4.76%	
5769.00	78	33	21	24	10	20	3	3	16	2	37.04%	24.69%	23.08%	16.67%	23.19%	6.67%	
Sums	1,052	483	193	376	107	340	36	34	142	17	27.94%	26.67%	26.67%	22.22%	23.47%	13.28%	

CENTRAL DISTRICT

Table 3: Long Beach 2000 HMDA Mortgage Denials

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

DOWNTOWN DISTRICT

TRACT	ALL DENIALS				MINORITY DENIALS			WHITE DENIALS			MINORITY DENIAL RATE			WHITE DENIAL RATE			
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	LOW OR
5759.00	109	24	36	49	11	11	2	17	17	2	16.92%	15.07%	25.00%	27.42%	17.53%	20.00%	
5760.00	9	4	2	3	2	2	0	0	2	0	50.00%	50.00%	0.00%	0.00%	40.00%	0.00%	
5761.00	70	15	30	25	3	12	0	3	26	1	33.33%	22.22%	0.00%	15.00%	23.42%	25.00%	
5762.00	26	11	12	3	3	6	2	4	6	2	21.43%	22.22%	33.33%	40.00%	20.00%	28.57%	
Sums	214	54	80	80	19	31	4	24	51	5	20.65%	19.62%	26.67%	25.81%	20.99%	23.81%	
DOWNTOWN DISTRICT																	

Table 3: Long Beach 2000 HMDA Mortgage Denials

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

EAST DISTRICT

TRACT	ALL DENIALS				MINORITY DENIALS			WHITE DENIALS			MINORITY DENIAL RATE			WHITE DENIAL RATE			LOW OR
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	
5712.00	68	19	29	20	1	17	1	1	28	0	20.00%	25.76%	16.67%	7.69%	14.66%	0.00%	
5735.00	1	0	0	1	0	0	0	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5736.00	54	12	21	21	1	10	1	2	19	0	50.00%	16.13%	25.00%	8.00%	9.05%	0.00%	
5737.00	60	10	21	29	0	10	0	2	19	0	0.00%	13.70%	0.00%	11.11%	13.19%	0.00%	
5738.00	57	9	25	23	2	7	0	3	22	0	66.67%	17.95%	0.00%	20.00%	14.97%	0.00%	
5739.02	19	5	6	8	1	3	1	1	5	0	33.33%	9.09%	100.00%	8.33%	7.58%	0.00%	
5740.00	54	13	24	17	0	12	1	3	21	0	0.00%	19.35%	100.00%	21.43%	11.80%	0.00%	
5741.00	39	5	13	21	1	4	0	2	10	1	25.00%	6.90%	0.00%	20.00%	5.88%	14.29%	
5742.01	31	4	12	15	0	4	0	0	12	0	0.00%	12.12%	0.00%	0.00%	13.79%	0.00%	
5742.02	12	0	5	7	0	0	0	2	2	1	0.00%	0.00%	0.00%	40.00%	7.69%	100.00%	
5743.00	44	5	23	16	0	5	0	3	20	0	0.00%	8.47%	0.00%	16.67%	12.74%	0.00%	
5744.00	50	11	26	13	0	11	0	3	23	0	0.00%	22.45%	0.00%	18.75%	13.94%	0.00%	
5745.00	73	9	34	30	1	8	0	5	29	0	25.00%	12.50%	0.00%	21.74%	16.02%	0.00%	
5746.01	2	0	1	1	0	0	0	0	1	0	0.00%	0.00%	0.00%	0.00%	50.00%	0.00%	
5746.02	11	2	8	1	0	2	0	0	8	0	0.00%	11.11%	0.00%	0.00%	20.00%	0.00%	
5747.00	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5748.00	7	1	4	2	0	1	0	1	3	0	0.00%	14.29%	0.00%	50.00%	4.41%	0.00%	
5749.01	51	2	36	13	0	2	0	4	31	1	0.00%	6.90%	0.00%	28.57%	21.99%	25.00%	
5749.02	8	2	3	3	1	1	0	1	2	0	16.67%	5.56%	0.00%	11.11%	5.71%	0.00%	
5750.01	24	6	11	7	1	5	0	1	10	0	25.00%	27.78%	0.00%	8.33%	16.39%	0.00%	
5750.02	50	19	20	11	2	17	0	3	16	1	28.57%	32.69%	0.00%	17.65%	13.45%	20.00%	
5765.00	104	46	24	34	18	24	4	3	18	3	36.73%	32.43%	33.33%	10.34%	18.37%	13.64%	
5766.00	110	21	50	39	5	16	0	3	45	2	27.78%	19.75%	0.00%	9.68%	15.20%	9.09%	
5767.00	30	4	12	14	0	4	0	1	11	0	0.00%	19.05%	0.00%	14.29%	10.00%	0.00%	
5768.00	58	17	23	18	2	14	1	1	21	1	18.18%	26.92%	20.00%	4.76%	14.89%	7.14%	
5770.00	59	13	29	17	6	7	0	5	20	4	30.00%	13.21%	0.00%	19.23%	15.50%	28.57%	
5771.00	55	8	27	20	1	7	0	1	26	0	16.67%	16.67%	0.00%	4.55%	13.98%	0.00%	
5772.00	45	5	23	17	1	4	0	3	18	2	25.00%	19.05%	0.00%	25.00%	14.75%	33.33%	
5773.00	40	1	25	14	0	1	0	1	22	2	0.00%	4.76%	0.00%	11.11%	13.02%	20.00%	
5774.00	29	1	21	7	0	1	0	1	20	0	0.00%	7.69%	0.00%	25.00%	15.27%	0.00%	

Table 3: Long Beach 2000 HMDA Mortgage Denials

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

5775.01	41	1	27	13	0	1	0	2	25	0	0.00%	8.33%	0.00%	40.00%	15.53%	0.00%
5775.02	8	1	5	2	0	1	0	0	5	0	0.00%	25.00%	0.00%	0.00%	10.87%	0.00%
5776.01	53	4	32	17	0	4	0	0	32	0	0.00%	16.00%	0.00%	0.00%	15.31%	0.00%
5776.02	29	5	15	9	1	4	0	4	11	0	50.00%	23.53%	0.00%	26.67%	12.94%	0.00%
5776.03	90	15	44	31	1	14	0	3	39	2	14.29%	17.95%	0.00%	10.71%	11.54%	28.57%
Sums	1,466	276	679	511	46	221	9	65	594	20	26.29%	17.44%	15.52%	14.10%	13.47%	11.17%

EAST DISTRICT

NORTH DISTRICT

TRACT	ALL DENIALS				MINORITY DENIALS			WHITE DENIALS			MINORITY DENIAL RATE			WHITE DENIAL RATE			LOW OR
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	
5701.00	45	20	8	17	0	19	1	0	6	2	0.00%	33.33%	25.00%	0.00%	24.00%	100.00%	
5702.01	85	41	7	37	16	24	1	2	5	0	37.21%	24.00%	12.50%	40.00%	19.23%	0.00%	
5702.02	77	38	7	32	8	30	0	2	4	1	17.02%	27.27%	0.00%	14.29%	14.81%	50.00%	
5703.01	81	34	10	37	11	21	2	3	6	1	32.35%	30.43%	16.67%	25.00%	22.22%	33.33%	
5703.02	109	49	18	42	16	33	0	6	12	0	27.59%	27.05%	0.00%	37.50%	28.57%	0.00%	
5704.00	194	85	21	88	23	59	3	6	13	2	27.06%	25.43%	23.08%	28.57%	29.55%	20.00%	
5705.00	223	87	23	113	32	50	5	7	14	2	32.00%	20.49%	16.67%	15.91%	14.74%	20.00%	
5706.00	192	80	24	88	23	53	4	10	14	0	24.73%	24.20%	19.05%	31.25%	17.95%	0.00%	
5715.01	88	32	19	37	7	25	0	2	16	1	18.42%	17.99%	0.00%	14.29%	16.33%	11.11%	
5715.02	55	27	9	19	3	23	1	0	8	1	20.00%	34.85%	25.00%	0.00%	12.31%	20.00%	
5716.00	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5717.00	185	82	24	79	29	50	3	7	16	1	23.39%	24.27%	13.64%	31.82%	30.77%	14.29%	
5718.00	35	6	15	14	1	5	0	3	12	0	20.00%	13.89%	0.00%	27.27%	10.71%	0.00%	
5719.00	52	18	17	17	1	16	1	1	16	0	20.00%	26.23%	33.33%	11.11%	11.68%	0.00%	
5721.00	28	13	3	12	3	8	2	0	2	1	42.86%	17.02%	100.00%	0.00%	8.00%	33.33%	
5724.00	32	19	3	10	5	13	1	1	2	0	41.67%	34.21%	50.00%	33.33%	40.00%	0.00%	
Sums	1,481	631	208	642	178	429	24	50	146	12	26.22%	24.57%	17.91%	22.94%	17.00%	15.58%	

NORTH DISTRICT

Table 3: Long Beach 2000 HMDA Mortgage Denials

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

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WEST DISTRICT

TRACT	ALL DENIALS				MINORITY DENIALS			WHITE DENIALS			MINORITY DENIAL RATE			WHITE DENIAL RATE			LOW OR
	TOTAL	MINORITY	WHITE	OTHER	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR INCOME	INCOME INCOME	LISTED AS 'NA'	LOW OR INCOME	MODERATE UPPER INCOME	MIDDLE AS 'NA'	OR UPPER E INCOME	INCOME UPPER INCOME	LISTED AS 'NA'	
5723.00	80	47	8	25	9	35	3	1	7	0	21.43%	27.56%	37.50%	14.29%	28.00%	0.00%	
5725.00	43	16	7	20	11	5	0	2	5	0	36.67%	25.00%	0.00%	28.57%	41.67%	0.00%	
5726.00	80	29	3	48	9	18	2	0	3	0	28.13%	18.95%	25.00%	0.00%	21.43%	0.00%	
5727.00	79	46	6	27	16	28	2	1	2	3	37.21%	22.58%	15.38%	14.29%	20.00%	60.00%	
5728.00	6	1	3	2	0	1	0	0	1	2	0.00%	50.00%	0.00%	0.00%	100.00%	100.00%	
5729.00	50	16	8	26	6	9	1	4	3	1	28.57%	18.00%	33.33%	66.67%	20.00%	33.33%	
5755.00	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5756.00	4	0	3	1	0	0	0	0	3	0	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	
Sums	342	155	38	149	51	96	8	8	24	6	30.36%	22.91%	24.24%	22.86%	30.00%	35.29%	
WEST DISTRICT																	
Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	Grand Total	4,555	1,599	1,198	1,758	401	1,117

Table 3: Long Beach 2000 HMDA Mortgage Denials

Prepared for Institute for Urban Research and Development by GeoDataVision August 10, 2001

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRPID	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L ncome	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Income Units Total
1	5729001	439	1,803	25,769	1,955	1	1	439	439	0	0	0
1	5729002	551	2,106	20,746	1,953	1	1	551	551	0	0	0
1	5753002	476	1,752	18,984	1,979	0	1	0	476	0	0	0
1	5753003	548	2,089	24,301	1,957	1	1	548	548	0	0	0
1	5754011	108	782	22,692	1,955	1	1	108	108	0	0	0
1	5754012	168	616	28,403	1,954	1	0	0	0	1	168	168
1	5754013	356	1,362	17,869	1,964	1	1	356	356	0	0	0
1	5754014	676	2,716	20,446	1,964	1	1	676	676	0	0	0
1	5754021	779	2,957	20,839	1,966	1	1	779	779	0	0	0
1	5754022	245	801	12,292	1,969	1	1	245	245	0	0	0
1	5755001	14	49	25,250	1,977	1	1	14	14	0	0	0
1	5755002	3	2	0	0	1	1	3	3	0	0	0
1	5755003	6	16	0	0	1	1	6	6	0	0	0
1	5755004	32	180	11,250	1,962	1	1	32	32	0	0	0
1	5755005	3	5	0	0	1	1	3	3	0	0	0
1	5758011	470	1,704	23,218	1,954	1	1	470	470	0	0	0
1	5758012	261	1,017	21,250	1,965	1	1	261	261	0	0	0
1	5758021	754	2,807	21,429	1,964	1	1	754	754	0	0	0
1	5758022	941	2,626	15,362	1,960	1	1	941	941	0	0	0
1	5758031	619	1,868	17,112	1,970	1	1	619	619	0	0	0
1	5758032	498	1,100	21,765	1,950	1	1	498	498	0	0	0
1	5759011	496	1,235	16,412	1,980	0	1	0	496	0	0	0
1	5759012	466	1,196	25,625	1,959	1	1	466	466	0	0	0
1	5759013	288	739	25,729	1,984	0	1	0	288	0	0	0
1	5759014	254	655	40,972	1,990	0	0	0	0	1	0	254

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRP	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L Income	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Income Units Total
1	5759021	1,136	1,757	26,490	1,974	1	1	1,136	1,136	0	0	0
1	5759022	886	1,444	27,857	1,957	1	1	886	886	0	0	0
1	5759023	862	1,907	22,823	1,964	1	1	862	862	0	0	0
1	5760002	1	2	0	0	1	1	1	1	0	0	0
1	5762001	508	1,553	18,889	1,951	1	1	508	508	0	0	0
1	5762002	670	1,290	20,667	1,961	1	1	670	670	0	0	0
1	5762003	758	1,283	17,311	1,961	1	1	758	758	0	0	0
1	5762004	700	1,502	28,977	1,961	1	0	0	0	1	700	700
1	5762005	3	11	0	0	1	1	3	3	0	0	0
1	5762006	3	13	0	0	1	1	3	3	0	0	0
1	5763002	410	1,471	23,750	1,967	1	1	410	410	0	0	0
1	5763003	351	1,148	16,417	1,941	1	1	351	351	0	0	0
1	5763004	481	1,140	25,179	1,961	1	1	481	481	0	0	0
1	5763005	480	990	29,063	1,981	0	0	0	0	1	0	480
1	5763006	327	1,204	28,922	1,966	1	0	0	0	1	327	327
1	5764012	820	3,053	16,315	1,965	1	1	820	820	0	0	0
1	5765011	754	2,275	21,042	1,956	1	1	754	754	0	0	0
2	5759021	1,136	1,757	26,490	1,974	1	1	1,136	1,136	0	0	0
2	5760001	197	440	12,361		1	1	197	197	0	0	0
2	5760002	1	2	0	0	1	1	1	1	0	0	0
2	5760003	1	3	0	0	1	1	1	1	0	0	0
2	5761001	612	826	31,429	1,953	1	0	0	0	1	612	612
2	5761002	866	1,096	90,181	1,968	1	0	0	0	1	866	866
2	5761003	610	747	45,227		1	0	0	0	1	610	610
2	5762002	670	1,290	20,667	1,961	1	1	670	670	0	0	0

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRP	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L ncome	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Incme Units Total
2	5762003	758	1,283	17,311	1,961	1	1	758	758	0	0	0
2	5762006	3	2	0	0	1	1	3	3	0	0	0
2	5764021	617	2,568	20,543	1,967	1	1	617	617	0	0	0
2	5764022	788	3,007	20,230	1,958	1	1	788	788	0	0	0
2	5764031	690	2,665	18,295	1,972	1	1	690	690	0	0	0
2	5764032	882	3,417	15,517	1,962	1	1	882	882	0	0	0
2	5765011	754	2,275	21,042	1,956	1	1	754	754	0	0	0
2	5765012	826	1,394	40,685	1,960	1	0	0	0	1	826	826
2	5765021	1,119	3,072	17,482	1,970	1	1	1,119	1,119	0	0	0
2	5765022	512	1,167	28,333	1,953	1	0	0	0	1	512	512
2	5765023	548	853	34,688	1,956	1	0	0	0	1	548	548
2	5765031	908	2,889	23,250	1,957	1	1	908	908	0	0	0
2	5765032	965	1,834	23,942	1,950	1	1	965	965	0	0	0
2	5766011	1,753	2,345	55,673	1,957	1	0	0	0	1	1,753	1,753
2	5766012	579	938	37,361	1,948	1	0	0	0	1	579	579
2	5766013	717	1,112	30,179	1,947	1	0	0	0	1	717	717
2	5766021	529	776	47,813	1,961	1	0	0	0	1	529	529
2	5766022	886	1,145	96,081	1,971	1	0	0	0	1	886	886
2	5766023	626	932	31,518	1,947	1	0	0	0	1	626	626
2	5766024	666	1,021	31,531	1,955	1	0	0	0	1	666	666
2	5768011	547	1,338	36,964	1,963	1	0	0	0	1	547	547
2	5768012	533	955	75,114	1,961	1	0	0	0	1	533	533
2	5768013	1,119	2,389	31,042	1,959	1	0	0	0	1	1,119	1,119
2	5768021	992	2,314	35,600	1,963	1	0	0	0	1	992	992
2	5768022	1,042	1,848	46,500	1,956	1	0	0	0	1	1,042	1,042

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRP	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L ncome	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Incme Units Total
2	5769012	691	2,108	31,845	1,956	1	0	0	0	1	691	691
2	5769022	1,336	3,585	27,887	1,945	1	1	1,336	1,336	0	0	0
3	5770004	468	1,012	51,042	1,963	1	0	0	0	1	468	468
4	5733002	331	1,186	24,950	1,955	1	1	331	331	0	0	0
4	5750021	625	1,598	54,708	1,966	1	0	0	0	1	625	625
4	5751011	809	2,890	16,108	1,977	1	1	809	809	0	0	0
4	5751012	725	2,306	41,250	1,969	1	0	0	0	1	725	725
4	5751021	658	2,606	18,063	1,955	1	1	658	658	0	0	0
4	5751022	628	2,204	25,134	1,965	1	1	628	628	0	0	0
4	5751031	1,250	3,485	21,288	1,966	1	1	1,250	1,250	0	0	0
4	5751032	819	1,995	26,641	1,970	1	1	819	819	0	0	0
4	5752021	506	2,225	22,448	1,960	1	1	506	506	0	0	0
4	5752023	324	1,249	18,750	1,954	1	1	324	324	0	0	0
4	5764031	690	2,265	18,295	1,972	1	1	690	690	0	0	0
4	5769011	666	2,269	21,146	1,972	1	1	666	666	0	0	0
4	5769013	594	2,002	14,857	1,965	1	1	594	594	0	0	0
4	5769021	744	2,134	29,464	1,971	1	0	0	0	1	744	744
4	5769023	690	2,158	22,846	1,970	1	1	690	690	0	0	0
5	5735001	0	0	0	0	1	1	0	0	0	0	0
5	5735002	0	1	0	0	1	1	0	0	0	0	0
5	5735003	0	0	0	0	1	1	0	0	0	0	0
6	5730011	537	1,770	21,163	1,958	1	1	537	537	0	0	0
6	5730012	657	2,142	21,275	1,952	1	1	657	657	0	0	0
6	5730013	639	1,846	29,271	1,947	1	0	0	0	1	639	639
6	5730014	475	1,350	23,611	1,947	1	1	475	475	0	0	0

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRP ID	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L Income	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Income Units Total
6	5730021	562	1,917	16,176	1,955	1	1	562	562	0	0	0
6	5730022	640	2,263	11,890	1,954	1	1	640	640	0	0	0
6	5731001	565	1,788	33,500	1,956	1	0	0	0	1	565	565
6	5731002	1,157	3,335	26,234	1,952	1	1	1,157	1,157	0	0	0
6	5731003	463	1,417	40,417	1,945	1	0	0	0	1	463	463
6	5731004	242	751	44,700	1,944	1	0	0	0	1	242	242
6	5732011	641	2,316	22,768	1,951	1	1	641	641	0	0	0
6	5732012	735	2,740	29,787	1,949	1	0	0	0	1	735	735
6	5732021	443	1,568	22,500	1,945	1	1	443	443	0	0	0
6	5732022	594	2,059	29,185	1,955	1	0	0	0	1	594	594
6	5732023	545	2,070	26,161	1,955	1	1	545	545	0	0	0
6	5733001	742	3,069	23,041	1,962	1	1	742	742	0	0	0
6	5733002	331	1,186	24,950	1,955	1	1	331	331	0	0	0
6	5752011	363	1,348	12,692	1,957	1	1	363	363	0	0	0
6	5752012	460	1,519	17,426	1,957	1	1	460	460	0	0	0
6	5752013	669	2,218	18,000	1,969	1	1	669	669	0	0	0
6	5752021	506	2,225	22,448	1,960	1	1	506	506	0	0	0
6	5752022	456	1,873	13,380	1,962	1	1	456	456	0	0	0
6	5752023	324	1,249	18,750	1,954	1	1	324	324	0	0	0
6	5753001	342	1,140	19,224	1,969	1	1	342	342	0	0	0
6	5753002	476	1,752	18,984	1,979	0	1	0	476	0	0	0
6	5763001	494	1,955	19,856	1,964	1	1	494	494	0	0	0
6	5763007	459	1,004	20,833	1,982	0	1	0	459	0	0	0
6	5764011	503	2,013	19,292	1,969	1	1	503	503	0	0	0
6	5764021	617	2,568	20,543	1,967	1	1	617	617	0	0	0

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRP	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L Income	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Income Units Total
7	5715013	1,400	2,742	39,861	1,960	1	0	0	0	1	1,400	1,400
7	5720022	882	2,317	42,300	1,973	1	0	0	0	1	882	882
7	5723011	521	1,921	42,297	1,959	1	0	0	0	1	521	521
7	5723012	440	1,693	35,592	1,959	1	0	0	0	1	440	440
7	5723021	211	864	45,625	1,950	1	0	0	0	1	211	211
7	5723022	216	791	48,438	1,954	1	0	0	0	1	216	216
7	5723023	435	1,847	36,630	1,955	1	0	0	0	1	435	435
7	5725001	1,328	3,700	22,664	1,971	1	1	1,328	1,328	0	0	0
7	5726003	335	1,423	44,118	1,951	1	0	0	0	1	335	335
7	5727002	292	1,095	38,750	1,946	1	0	0	0	1	292	292
7	5728001	28	262	37,778	1,983	0	0	0	0	1	0	28
7	5728002	0	0	0	0	1	1	0	0	0	0	0
7	5728003	1	1	0	0	1	1	1	1	0	0	0
7	5729001	439	1,803	25,769	1,955	1	1	439	439	0	0	0
7	5729002	551	2,106	20,746	1,953	1	1	551	551	0	0	0
7	5729003	326	1,204	41,328	1,947	1	0	0	0	1	326	326
7	5730013	639	1,846	29,271	1,947	1	0	0	0	1	639	639
7	5730014	475	1,350	23,611	1,947	1	1	475	475	0	0	0
7	5731002	1,157	3,335	26,234	1,952	1	1	1,157	1,157	0	0	0
7	5731003	463	1,417	40,417	1,945	1	0	0	0	1	463	463
7	5731004	242	751	44,700	1,944	1	0	0	0	1	242	242
7	5735002	0	1	0	0	1	1	0	0	0	0	0
8	5703031	490	1,580	32,308	1,953	1	0	0	0	1	490	490
8	5703032	772	2,287	30,625	1,960	1	0	0	0	1	772	772
8	5703041	490	1,721	31,855	1,959	1	0	0	0	1	490	490

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRP	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L ncome	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Incme Units Total
8	5703042	629	1,931	25,573	1,966	1	1	629	629	0	0	0
8	5703043	328	1,172	28,365	1,955	1	0	0	0	1	328	328
8	5706011	674	2,086	24,213	1,947	1	1	674	674	0	0	0
8	5706012	700	2,096	33,026	1,954	1	0	0	0	1	700	700
8	5706013	277	977	28,500	1,955	1	0	0	0	1	277	277
8	5706021	528	1,888	32,214	1,953	1	0	0	0	1	528	528
8	5706022	567	1,905	35,893	1,955	1	0	0	0	1	567	567
8	5706024	380	1,400	32,917	1,960	1	0	0	0	1	380	380
8	5706031	489	1,385	27,500	1,973	1	1	489	489	0	0	0
8	5706032	1,149	3,067	25,250	1,970	1	1	1,149	1,149	0	0	0
8	5706033	156	324	26,750	1,983	0	1	0	156	0	0	0
8	5715013	1,400	2,742	39,861	1,960	1	0	0	0	1	1,400	1,400
8	5716001	772	1,988	12,380	1,960	1	1	772	772	0	0	0
8	5717011	496	1,700	29,798	1,955	1	0	0	0	1	496	496
8	5717012	595	2,063	35,550	1,947	1	0	0	0	1	595	595
8	5717013	737	2,351	31,622	1,959	1	0	0	0	1	737	737
8	5717021	443	1,572	31,898	1,950	1	0	0	0	1	443	443
8	5717022	1,123	3,314	31,763	1,963	1	0	0	0	1	1,123	1,123
8	5717023	246	870	45,469	1,949	1	0	0	0	1	246	246
8	5717024	237	897	27,472	1,952	1	1	237	237	0	0	0
8	5717025	275	973	24,321	1,958	1	1	275	275	0	0	0
8	5720022	882	2,317	42,300	1,973	1	0	0	0	1	882	882
9	5424023	0	0	0	0	1	1	0	0	0	0	0
9	5702022	376	1,391	39,773	1,952	1	0	0	0	1	376	376
9	5702023	209	788	44,750	1,948	1	0	0	0	1	209	209

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRP	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L Income	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Income Units Total
9	5702025	526	2,155	40,556	1,951	1	0	0	0	1	526	526
9	5702031	778	2,745	28,942	1,958	1	0	0	0	1	778	778
9	5702032	469	1,307	25,536	1,963	1	1	469	469	0	0	0
9	5702041	322	1,274	50,417	1,955	1	0	0	0	1	322	322
9	5702042	730	2,710	25,625	1,959	1	1	730	730	0	0	0
9	5703011	1,362	3,890	24,457	1,967	1	1	1,362	1,362	0	0	0
9	5703031	490	1,580	32,308	1,953	1	0	0	0	1	490	490
9	5703032	772	2,287	30,625	1,960	1	0	0	0	1	772	772
9	5704011	360	1,465	51,280	1,960	1	0	0	0	1	360	360
9	5704012	815	3,312	30,469	1,954	1	0	0	0	1	815	815
9	5704013	463	1,918	23,015	1,961	1	1	463	463	0	0	0
9	5704014	442	1,540	33,229	1,966	1	0	0	0	1	442	442
9	5704021	382	1,317	57,000	1,954	1	0	0	0	1	382	382
9	5704022	315	1,157	30,764	1,950	1	0	0	0	1	315	315
9	5704023	277	936	69,167	1,959	1	0	0	0	1	277	277
9	5705013	607	2,195	47,146	1,947	1	0	0	0	1	607	607
9	5705024	392	1,400	45,900	1,949	1	0	0	0	1	392	392
9	5706012	700	2,096	33,026	1,954	1	0	0	0	1	700	700
9	5706023	366	1,189	31,438	1,954	1	0	0	0	1	366	366
9	5706031	489	1,385	27,500	1,973	1	1	489	489	0	0	0
9	5717011	496	1,700	29,798	1,955	1	0	0	0	1	496	496
		107,598						57,355	59,706		47,130	47,892
								(a)	(b)		(c)	(d)

Lead Based Paint Data Analysis for Long Beach Community Development Block Group Area

Council District	BLKGRPID	Housing Units	Total Population	Median Income	Year Built	Yes, LBP	Yes, Below L ncome	L Income Units W/ LBP	Low Income Units Total	Yes, Above L Income	Above L Income Units W/ LBP	Above L Incme Units Total
Total Long Beach Housing Units					107,598							
Percentage of LBP in L Income Units (a/b)					96.06%							
Percentage of LBP in >L Income Units (c/d)					98.41%							

Income	LBP Percentage	HU
≤ L	54.89%	55.49%
≥ L	45.11%	44.51%
Total HU	104,485	107,598

Legend	LBP	Housing Units Built Befor 1978 & Assumed to Have Lead Base Paint
	HU	Housing Units
	>L	Income (>\$28,200) Considered Above Low Income For a Family of 4 Based on Area Median Family Income
	<L	Income (< \$28,200) Considered Below Low Income For a Family of 4 Based on Area Median Family Income
	L	50% to 30% of LA/Long Beach Area Median Income (\$50,300)
	1	TRUE
	0	FALSE

APPENDIX B:

Public Consultation & Community Input

**COMMUNITY DEVELOPMENT ADVISORY COMMISSION ROSTER OF
MEMBERS – AUGUST 2001**

**CHRISTINA ARONHALT, CHAIR
MARY LYNN BUTLER, VICE CHAIR**

ALVARO JOSE CASTILLO

FRANCES S. GROVER

JILL HILL

PEGGY KARAVANICH

PATRICIA LOFLAND

DIANNE MC NINCH

J. PAUL ROBINSON

TAMASHA ROSS-KAMBON

ELLIOT SMITH

JOHN W. THOMAS

C. ANNA ULASZEWSKI



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

833 West Ocean Boulevard, 3rd Floor Long Beach, California 90802 (562) 570-6668 FAX (562) 570-5248

NEIGHBORHOOD SERVICES BUREAU

April 4, 2001

Dear Concerned Citizen:

On behalf of the City of Long Beach, The Fair Housing Foundation is conducting an Analysis of Impediments to Fair Housing Choice. The analysis will provide a comprehensive review of policies, procedures and practices within the city that affect the availability and accessibility of housing and the current residential patterns and conditions related to fair housing choice.

In developing a comprehensive analysis, we are seeking input from a wide array of community residents and service providers who can share with us personal experiences, as well as those of their neighbors and people they work with, as it relates to the local housing market.

You are cordially invited to participate in a focus group session to be conducted with Long Beach community representatives. The session will be held on April 19, 2001 from 1 pm to 4 pm at the Long Beach Public Library Auditorium, 101 Pacific Avenue, Long Beach, California.

The focus group session will be conducted by the Institute for Urban Research and Development, a public policy research and analysis organization that has conducted several fair housing studies throughout Los Angeles County.

Your participation will provide us with valuable first-hand information to include in our analysis of fair housing choice in the City of Long Beach. We hope you will be able to join us.

Please call (562) 901-0808 to confirm your attendance.

Thank you in advance for your assistance and participation.

Sincerely,

John B. Wills
Development Project Manager



PUBLIC MEETING ON Fair Housing

Have you or your friends ever experienced any form of discrimination while looking for housing in the City of Long Beach? Do you know anyone who was not allowed to buy a home or rent an apartment because they were the wrong color, a family with children, disabled or gay? The City of Long Beach is holding a Focus Group to discuss Housing Discrimination.

We want to hear from you! We are requesting comments from community residents who can share experiences with housing discrimination in the City of Long Beach; the refusal to rent or sell solely based upon race, families with children, sexual preference, and other illegal grounds.



WHEN: *APRIL 19, 2001*

WHERE: *Long Beach Library Auditorium, 101 Pacific Avenue*

TIME: *6:30 P.M.*

CONTACT: *BJ Wills, Development Project Manager, 570-6668.*

YOU CAN MAKE A DIFFERENCE IN YOUR COMMUNITY

The City of Long Beach intends to provide reasonable accordance with the Americans with Disabilities Act of 1990. If a special accommodations is required or to request this information in alternate format, please contact BJ Wills at (562) 570-6668 48 hours prior to the meeting.



REUNIÓN PÚBLICA

Sobre La Vivienda Equitativa

- ¿Alguna vez ha tenido usted o sus amigos una experiencia en forma de discriminación cuando trataba de encontrar vivienda en la Ciudad de Long Beach?
- ¿Conoce usted a alguien que no ha podido comprar una casa o rentar un departamento por que fueron del color no aceptable, o una familia con niños, o incapacitados o gay? La Ciudad de Long Beach va a tener una reunión de Grupo de Enfoque para dialogar sobre la Discriminación de la Vivienda.

¡Deseamos oír sus voces! Estamos pidiendo los comentarios de los residentes comunitarios que puedan compartir las experiencias sobre la discriminación de la vivienda en la Ciudad de Long Beach; el negarse a rentar o vender solamente basado en la raza, o familias con niños, preferencia sexual, y otras excusas ilegales.



CUANDO: 19 DE ABRIL, 2001

DONDE: Long Beach Library Auditorium, 101 Pacific Avenue

HORA: 6:30 P.M.

CONTACTE: BJ Wills, Administrador del Proyecto de Desarrollo al 570-6668

USTED PUEDE MARCAR UNA DIFERENCIA EN SU COMUNIDAD

La Ciudad de Long Beach tiene la intención de proveer acomodaciones razonables en concordancia con el Acto de 1990 de Americanos con Incapacidades. Si se necesita una acomodación especial o si desea esta información en un formato alterno, por favor contacte a BJ Wills al (562) 570-6668 como 48 horas antes de la reunión.



ការប្រជុំជាសាធារណៈស្តីអំពី សមិទ្ធិនៃលំនៅឋាន

តើលោកអ្នកឬមិត្តភក្តិដែលមានច្បាប់ការប្រកាន់ពូជសាសន៍ណាមួយដែលកំពុងដើរស្វែងរកផ្ទះសម្បែងរស់នៅខាងក្រុងឡងប៊ិចដែរឬទេ? តើលោកអ្នកមានជីវិតជាសាធារណៈក្នុងតំបន់ដែលមានទីក្រុងឡងប៊ិច បានដោយសារមានពលរដ្ឋរដ្ឋផ្សេងៗ... ដោយសារតែមានកូនឬដោយសារតែមានភាពពិការ, ឬក៏ឆ្លើយ? ទីក្រុងឡងប៊ិច នឹងមានធ្វើការប្រជុំពិភាក្សាលើការប្រកាន់ពូជសាសន៍រាល់នៅស្ថាន ។

យើងចង់ឮនូវការប្រកាន់ពូជសាសន៍ យើងសំណូមពរចង់បាននូវការស្តាប់ពីអ្វីដែលប្រជាជនដើម្បីធ្វើការចែកចាយឆ្លានរំកិលសេចក្តីលើកលើយដែលមានការប្រកាន់ពូជសាសន៍ខាងក្រុងឡងប៊ិច ដូចជាការបដិសេធន៍ លើការជួលជួលកន្លែងដោយយោងទៅលើជាតិសាសន៍, ព្រះសាសនា, ភេទ, ឬភាពណាមួយទៀតដែលមិនស្របច្បាប់។



នៅ: ថ្ងៃទី ១៩ មេសា, ២០០១

នៅ: សាលប្រជុំនៃបណ្ណាល័យឡងប៊ិច

Long Beach Library Auditorium, 101 Pacific Avenue

ម៉ោង: ៦:៣០ ល្ងាច

សូមទាក់ទង: BJ Wills

លោកអ្នកនេះហើយអាចធ្វើការកែប្រែនូវស្ថានភាពរបស់សង្គម។

ទីក្រុងឡងប៊ិចនឹងធ្វើការឆ្លើយសម្រួលដើម្បីធ្វើឱ្យពលរដ្ឋមានការយល់ដឹងអំពីការប្រកាន់ពូជសាសន៍ដែលបានចែងក្នុងច្បាប់ថ្មី ១៩៩០។ ប្រសិនបើ លោកអ្នកត្រូវការបន្ថែមនូវព័ត៌មានណាមួយ ឬក៏ជាមុនច្បាប់ឡងប៊ិច សូម ទាក់ទងទៅលោក BJ Wills តាមរយៈលេខ ៥៧០-៦៦៦៨ ។

LEGAL AID FOUNDATION OF LOS ANGELES

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Writer's Direct Dial Number (213) 640-3865

September 18, 2001

Melanie Fallon
Director, Department of Community Development
City of Long Beach
333 West Ocean Blvd., 3rd Floor
Long Beach, CA 90802

SENT VIA FACSIMILE AND FIRST CLASS MAIL

**RE: COMMENTS RE: THE 2001 ANALYSIS OF IMPEDIMENTS TO FAIR
HOUSING CHOICE FOR THE CITY OF LONG BEACH**

Dear Melanie:

The Legal Aid Foundation of Los Angeles has reviewed the 2001 Analysis of Impediments to Fair Housing Choice for the City of Long Beach ("AI") and we are impressed with its analysis. We do, however, offer the following comments as ways in which the 2001 AI can be improved.

1. HUD's Fair Housing Planning Guide ("FHPG"), Vol. 1, p. 2-22 - 2-23, provides that the AI should "define a clear set of objectives with measurable results that it intends to achieve." For each objective, the FHPG provides that the AI should "determine the time period for completion" and a "process for monitoring the progress in carrying out each action and evaluating its effectiveness." While the City of Long Beach's 2001 AI discusses many positive objectives, it falls short in developing a time period for completion and a process for monitoring the progress of those objectives. The AI in many places, therefore, lacks the specificity of detail required by HUD. The following is a list of objectives contained in the 2001 AI for the City of Long Beach that lack the level of detail required by HUD.
 - a. On page 34, the AI provides that there are segregation patterns within the City of Long Beach. The eastern part of the City, for example, is

populated primarily by Whites. The AI recommends that the City take a close look at this issue to ensure that equal housing opportunities are available in the eastern part of the City. The AI fails, however, to suggest how this problem should be studied, when it should be studied or what should be done with the results of the study. Although the AI discusses this issue further on page 92, it still fails to provide a sufficient level of detail.

- b. On page 69, the AI provides that the City should establish a "No Tolerance of Predatory Lending" educational campaign. The AI, however, fails to provide a timetable for the campaign. It also fails to state who will develop the educational materials for the campaign, who will be targeted by the campaign, how many people the campaign hopes to reach and how the effectiveness of the campaign will be measured.
- c. On page 75, the AI provides that evidence suggests there may be a systematic practice of discriminatory lending in the City. The AI states that a more detailed study and analysis is necessary to determine if this is true. The AI fails, however, to provide how this study should be conducted, when it should be conducted and what should be done if the results of the study affirm the existence of discriminatory lending practices. The AI further discusses discriminatory lending practices on page 93, yet this discussion also lacks the specificity of detail required by the FHPG.
- d. On page 75, the AI states that at the very least, "data suggests that a stronger effort should be made to promote homeownership opportunities and encourage improved lender performance in awarding credit to African American and Hispanic/Latino households." The AI does not suggest who should promote these opportunities or how the opportunities should be promoted. The AI also fails to provide a timetable for promoting these opportunities and a means by which the success of promoting these opportunities can be measured.
- e. On page 91, the AI lists the services provided by the Fair Housing Foundation to the City of Long Beach. While this list encompasses many worthy objectives, there is no level of detail provided as to how these objectives will be carried out, when they will be carried out and how their success will be measured. More detail is needed. For example, the AI states that the Fair Housing Foundation will: "Provide education, training and outreach regarding Fair Housing laws and issues of cultural sensitivity for local realtors, rental property owners, managers, and agents." This objective is too vague. The AI should explain how many realtors, landlords, etc. will be targeted. It should explain how these realtors, landlords, etc. will be targeted. And, the AI should state how success of the education, training and outreach will be measured.

- f. On page 92, the AI provides that the City should investigate and address evidence of differential treatment faced by African Americans in the rental housing market. The AI fails, however, to provide any level of detail regarding how this investigation should be conducted and how the problem of differential treatment, if confirmed, will be addressed.
 - g. On pages 10-11 and 92, the AI explains that female headed households face a disproportionate number of housing issues in the City. The AI states that this trend is alarming and that it requires an in depth study by the City, yet the AI fails to describe the type of study necessary. It also fails to set a timeline for conducting such a study.
 - h. On page 93, the AI states that the City should expand its promotion of fair housing choice in the Long Beach housing market. This recommendation is made, in part, as a result of the fact that Asian and Hispanic/Latino households are underrepresented amongst those reporting housing concerns or complaints. (See AI p. 11). The AI recommends, amongst other things, PSA's and expanded outreach to attain fair housing choice for all. More specificity is necessary, however. The AI should discuss the subject of the PSA's, how many PSA's will be developed over the next year, the target audience of the PSA's and how success of the PSA's be measured. The AI should similarly explain how the targeted outreach will be conducted to Asian and Hispanic/Latino households, with a timeframe for when the outreach will be conducted and a means for measuring the success of the outreach.
- 2. On pages 50-54, the AI relies upon and discusses the "Housing Discrimination Study of 1989: Differential Treatment in Rental Sales and Sales Markets." This study is twelve years old and is therefore outdated. The AI should rely on more recent studies.
 - 3. On pages 60-65, the AI discusses information obtained at a focus group of housing professionals. The purpose of this section of the AI is unclear, as it does not address impediments to fair housing in the City. The information provided is of limited use, moreover, because identifying information regarding the members of the focus group is not provided. Information is not provided, for example, regarding the number of attendees, the professional capacity of the attendees and the methodology used to record the statements of the attendees.
 - 4. On page 76, the AI provides an analysis of local land use and zoning practices, yet it fails to discuss the impact of the City's zoning on homeless shelters. The City's zoning code, for example, requires homeless shelters to obtain a conditional use permit, whereas hotels are not required to do so for the same land use (i.e., temporary housing). This is an impediment to fair housing that should be addressed in the AI.

5. On pages 80-84, the AI discusses the impact of local land use and zoning practices, yet fails to address the fair housing implications of the recently passed Anaheim Street Moratorium (Ordinance No. C-7751). This Moratorium prohibits social services along with gun and alcohol sales on a significant portion of Anaheim Street in the City of Long Beach. The Moratorium is problematic for two reasons. First, the moratorium fails to provide a definition of what constitutes a "social service." The moratorium is therefore so broad that it impedes efforts to provide even the least disruptive and critically needed social services to low-income individuals. Second, the moratorium's prohibition against social services is an impediment to fair housing because the moratorium makes social services inaccessible to the low-income residents living in the area, which disproportionately impacts women and minorities.
6. On pages 88-89, the AI briefly discusses the impact of lead-based paint on low-income children. The AI does not, however, discuss the disparate impact that lead-based paint has on minorities. The AI should suggest ways to combat lead as an impediment to fair housing. Possible ideas include strengthening the City's lead ordinance, developing lead-safe work practices and creating mandatory free testing for young children. The AI should set concrete objectives to battle the City's lead problem, develop a timetable for meeting those objectives and describe a way in which the success of those objectives can be measured. Long Beach has the third highest rate of lead poisoning among children in the State of California. It is imperative that this impediment to fair housing be addressed in the AI.
7. The FHPG, on page 2-21, provides that once the AI is complete, cities should communicate the results of the AI to policy makers, key government staff, community organizations and the general public. The FHPG further provides that cities should provide copies of the AI to all organizations and individuals who contributed to it, that cities should advise the general public about the AI by holding public forums in accessible meeting facilities with interpreters and that key aspects of the AI should be publicized. The AI does not mention whether the City has complied with these duties. A short section should be added to the AI to discuss what the City has done, or will do, to satisfy its duties to communicate the results of the AI.
8. On February 24, 1997, the Director of HUD's Civil Rights Division sent a letter to Mr. James Hankla, City Manager of the City of Long Beach at that time.¹ In this letter, HUD commented on the City's 1996 AI. HUD stated that the City's 1996 AI "does not include many of the areas that ought to be analyzed" and that it "was not conducted in a manner called for in the Fair Housing Planning Guide." Although some of the deficiencies listed in HUD's letter are remedied in the 2001

¹ A copy of this letter is attached hereto. HUD's discussion of the City of Long Beach's 1996 AI is located on pages 2-4 of this letter.

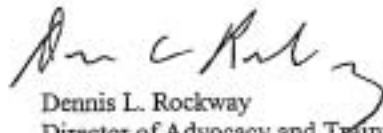
September 18, 2001

AI, some of them still remain. The following deficiencies remain in the City's 2001 AI:

- a. The AI does not discuss policies and practices that connect transportation and social services with housing opportunities.
 - b. The AI does not discuss whether government services are provided equally throughout all neighborhoods.
 - c. The AI does not discuss the policies and practices of local public housing agencies. The AI should discuss the policies and practices of the Long Beach Housing Authority and the Housing Authority of the County of L.A. ("HACOLA"), as HACOLA operates the Carmelitos Public Housing Development in Long Beach.
9. On January 1, 2000, California law made it illegal to discriminate based on source of income. See California Civil Government Code Section 12955. A Section 8 voucher is a source of income. It is therefore illegal for a landlord to refuse to rent to an individual because he or she receives Section 8 assistance. Unfortunately, however, it is common practice for landlords in the City of Long Beach to refuse to rent to those receiving Section 8 assistance. A majority of those individuals receiving Section 8 assistance, moreover, are women and minorities. This is an impediment to fair housing that is not addressed the City's AI and it should be.

Thank you for your consideration of our comments. Should you have any questions, I can be reached at (213) 640-3865.

Sincerely,


Dennis L. Rockway
Director of Advocacy and Training

Attachment

CC: Barbara Schull, Fair Housing Foundation

BJ Wills, Development Project Manager, City of Long Beach



U.S. Department of Housing and Urban Development
Los Angeles Area Office, Pacific/Hawaii Area
611 West Sixth Street
Los Angeles, California 90017

COPY

February 24, 1997

Mr. James C. Hankla
City Manager
ATTENTION: Mr. Craig Beck
City of Long Beach
333 West Ocean Blvd.
Long Beach, CA 90802

Dear Mr. Hankla:

SUBJECT: Consolidated Submission/Plan
On-site Monitoring

On November 12 and 13, 1996, Ms. Ana L. Madrigal, Equal Opportunity Specialist, conducted an on-site Fair Housing and Equal Opportunity monitoring review of the Consolidated Submission/Plan that is implemented and administered by the City of Long Beach.

The review was conducted under the authority of Title VI of the Civil Rights Act of 1964, the Fair Housing Act of 1968, as amended, Section 109 and Section 104(b)(2) of the Housing and Community Development Act of 1974, as amended, and applicable HUD Regulations. The objective of the monitoring review was to determine whether the City of Long Beach's performance conforms with applicable fair housing and equal opportunity requirements, as they impact on persons protected by the Civil Rights Laws and Executive Orders. The review took into account the cumulative programs' funding.

Summary

Our monitoring concluded with no negative findings, as such. However, we do have two resulting concerns relating to (1) requirements to complete an Analysis of Impediments (AI) to fair housing choice and (2) the requirement to implement an employment and business effort under Section 3 of the Housing and Community Development Act of 1968, as amended.

I. Affirmatively Furthering Fair Housing

The Fair Housing Act, Section 104(b)(2) of the Housing and Community Development Act of 1974, as amended, and 24 CFR 570.601 require that the grantee assume the responsibility of fair housing planning by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified

through that analysis, and maintaining records reflecting the analysis and actions in this regard.

The City of Long Beach contracts with the Long Beach Fair Housing Foundation (FBF) to provide fair housing services to the City's residents.

From July 1, 1995 to June 30, 1996, FBF provided services to 8,409 individuals and families. Based on the statistics shown, out of this number 30% were Latino, 36% African American, 29% were Caucasian, 2% were Asian/Pacific Islanders, less than 1% were American Indian. In addition, 54% of this number were identified as female heads of household.

According to records provided, in 1995/1996, the FBF received over 1000 inquiries, many of which resulted in fair housing complaints. FBF appears to have conducted 305 investigations. Based on the records reviewed the majority of the complaints filed were race based. In the City of Long Beach there were 99 cases, out of which 40 were race based. A review of the intake procedure, investigations, evaluations and resolutions was conducted. Additionally, copies of actual complaints were reviewed.

In 1995 and 1996, records show that legal information on Fair Housing was provided at workshops conducted by FBF in the City of Long Beach for over 1500 persons. Within the same year over 5600 pieces of informational literature were apparently distributed in the City of Long Beach. Literature distributed included English, Spanish and Khmer. FBF conducted ten Fair Housing Workshops in the City of Long Beach and staffed three Fair Housing booths at various events. The above information was verified through interviews, files and other documentation provided by the City and FBF staff. Based on all the documentation it was apparent that the City, through its contract agent, FBF, had carried out activities intended to affirmatively further fair housing.

Analysis of Impediments to Fair Housing Choice (AI)

The City's AI was completed on February 6, 1996. A copy of the City's AI was provided during our monitoring review. Our review of the City's AI has resulted in the following comments:

- (1) Generally, we find that the completed AI does not include many of the areas that ought to be analyzed and was not conducted in a manner called for in the Fair Housing Planning Guide that was provided to the

City at training workshops and through general mailings from HUD's Headquarters in Washington.

- (2) There appears to have been little or no corroboration during the completion of the AI with community organizations, other housing providers, realtors, lenders, etc. as called for in HUD's Fair Housing Planning Guide.
- (3) Other issues, matters and local practices which the Planning Guide indicated for inclusion, but omitted in the Long Beach AI, were the following:
 - + A discussion of the methodology used in preparing the AI.
 - + Certain data sources, such as educational data and mapping software.
 - + The use of accessibility standards in local construction.
 - + Policies concerning the application of site and neighborhood standards for local new construction developments, especially for assisted developments.
 - + Policies and practices that connect transportation and social services with housing opportunities.
 - + Whether government services are provided equally through all neighborhoods.
 - + Policies and practices of your public housing agencies.
 - + "All adult" issues, deed restrictions, inaccessible designs, local occupancy standards and practices, local lending practices, real estate appraisal practices, insurance underwriting practices, and segregated housing conditions locally.
- (4) The City's AI concluding list of impediments include general social and economic problems and conditions which do not relate to fair housing choice; as such, problems not dealing with race, color or other personal characteristics covered by fair housing laws or not related to housing discrimination. The analysis is focused outside of the provided fair housing guidance, on problems of affordability instead of problems related to housing discrimination, direct or indirect. Thus the actions proposed, for the most

part, are not fair housing or viewed as intended to further fair housing.

We recommend that the City of Long Beach revisit this process during the coming months in order to improve significantly those parts of your AI that are not in keeping with our Fair Housing Guide. We are including a Self-Review Form for your use to help in this process. We will be happy to provide further assistance and an additional copy of the Fair Housing Guide, if you desire such. We would appreciate a response to this concern within 60 days of receiving this letter.

II. Equal Benefits Opportunities

Section 24 CFR 570.602 of the CDBG regulations, Title VI of the 1964 Civil Rights Act, and Section 109 of the Housing and Community Development Act of 1974, as amended, prohibit discrimination on the basis of race, color, national origin or gender in the use of CDBG funds and indicate appropriate affirmative action to be undertaken in order to ensure that the program or activity is open to all without regard to race, color, or national origin.

Among the CDBG funded projects is one that provides residents with various self-help programs to improve their homes. After meeting certain income guidelines and once approved, homeowners can participate in the various programs. The Home Improvement Rebate Program (HIRP) and the Homeowner-occupant Rehabilitation Loan Program together provided 765 loans to Long Beach residents. Out of this number, 89% were minority residents and 43% were female heads of household.

Interviews concerning the City's Rehabilitation Program were conducted with various City representatives, and a review of several files and documents was conducted in order to verify information on the way the program operates and regarding beneficiaries.

An interview was also conducted with the person overseeing the Graffiti Prevention Mural Program. According to the representative, an average of 25 to 50 residents, between the ages of 14 and 25 years old, attend annually. Well known local artists volunteer their time and skills to teach residents participating in the program. For the 1995/1996 fiscal year, 41 Census tracts were included. Records showed that 32 out of the 41 Census tracts involved in the program had over 50% minority residents (an average of 80% on the majority of these census tracts). The other nine were below 50%, including a

census tract with 0% minority residents. Eight murals were completed and \$87,557 was spent for fiscal year 1995/1996. Some of these sites were visited in order to verify the information as reported.

Based on the information, records and interviews provided, it seems that the City of Long Beach is doing well in terms of providing equal benefits opportunities in the above mentioned programs.

III. Section 3 Program

According to 24 CFR Part 135 of the federal regulations for Section 3 of the Housing and Urban Development Act of 1968, as amended, whenever HUD financial assistance is provided at \$200,000 or more for housing or community development construction projects, to the greatest extent feasible, economic opportunities will be given to low-income residents and businesses in those areas where the construction takes place.

While on-site, interviews were conducted with the various city employees involved in Section 3, including the person responsible for overseeing the program. Apparently, a mechanism to collect the data was not in place. However, the City Representative was in the process of developing a mechanism. Based on the records reviewed, the proper City Staff has been trained or attended the 1995 workshop sessions provided by this office. Records also show that in qualified Section 3 City contracts, all necessary language is included. Section 3 is also properly addressed apparently during the bidding process.

Furthermore, prior to the monitoring review, there was a written exchange of information between the City and this office. The exchange was in reference to a specific Section 3 qualified construction project currently being developed in the City. During this exchange, it was clearly stated that all necessary measures are being taken in order to ensure that Section 3 requirements are met. On December 2, 1996, this exchange was followed up with a telephone conversation in which, again, compliance with Section 3 regulations was assured.

At the time of the monitoring, the Section 3 Report for fiscal year 1995/1996, had not been submitted by the City. Thus, we recommend that this report be sent to this office as soon as possible in order to clear our concern in reference to Section 3. Enclosed find the Section 3 "Technical Assistance Team Report", which I promised to make available to City during our December 2, 1996,

telephone conversation.

IV. Minorities/Women Business Enterprise MBE/WBE

According to 24 CFR 85.36, recipients have an obligation to take reasonable actions to maximize opportunities for minority and women contractor participation in the CDBG program.

Based on the City's Contract and Sub-contract Activity Report, minority business owners received 28% of the total (approximately \$3,209,780) program monies spent during fiscal year 1995/1996. Women owned business (WBE) participation was 15% (approximately \$500,000) of the total amount spent for same fiscal year. Two of the WBE owners were interviewed during the monitoring and one of the sites was visited. During the interviews both women gave detail accounts of their participation in the WBE program. These details appeared to coincide with the recorded information.

An interview was also conducted with a City Representative currently overseeing the City's Business Development Center. Their most successful program, according to the City Representative, is their annual Minority-Owned and Women-Owned Business Development Conference.

Based on the above information, it is apparent that the City is currently meeting their MBE/WBE requirements as stated on the regulations.

V. Section 504 Regulations

Section 504 of the Rehabilitation Act of 1973, as amended, states in pertinent part that "no otherwise qualified individual with handicaps in the United States...shall, solely by reason of his/her handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The City of Long Beach used an outside consultant to conduct their assessment and transitional plan. The transitional plan was completed on September 1, 1995. A copy of the assessment and plan were available and reviewed during the monitoring. Among the City's first projects were the public library and the Council Chambers. A list of their improvements schedule, showed that out of about 30 proposed projects, about 50% have been completed. Based on these records, it appears that the City completed their assessment and transitional plan as required by the

regulations.

We appreciate the time, courtesy and cooperation provided by Mr. Craig Beck and other staff members during the monitoring review. Should you have any questions or require additional information please contact this office at (213) 8948040.

Very sincerely yours,

Thomas F. Honore
Thomas F. Honore
Director
Civil Rights Division

Enclosure

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September 18, 2001

Melanie Fallon
Director, Department of Community Development
City of Long Beach
333 West Ocean Blvd., 3rd Floor
Long Beach, CA 90802

RE: 2001 Long Beach Analysis of Impediments

VIA FACSIMILE: 562-570.6215

Dear Ms. Fallon:

I am a Community Health Promoter at Legal Aid Foundation of Los Angeles. I bring to this position eight years of experience in working on Lead as a health, housing and economic development issue. In my previous work I collaborated with community development agencies, housing advocates and health advocates to bring about change in how lead poisoning and lead-based paint hazards were mitigated. As a Community Health Promoter, I am charged with working with community organizations, the Long Beach Health Department and the Long Beach Building and Planning Department to look at current policy as it relates to Intervention vs. Prevention of lead hazards and the health of a child. I will work with these agencies to look at how we revise or create policy that keeps housing units on the market and keeps them safe and affordable while ensuring the health and safety of children and their families.

The link of lead, housing (fair housing and affordable housing) and economic development is important and any analysis of impediments should demonstrate how that link affects a persons right to choose where they live. I offer these additional comments from Legal Aid Foundation of Los Angeles regarding the Analysis of Impediments to Fair Housing Choice for the City of Long Beach; specifically the section on Fair Housing and Lead-based paint. While I found that the Fair Housing Foundation has a clear understanding of the sources and risks associated with lead-based paint, there is a need for clarification as to the work plan, methodology and analysis of lead-based paint and code enforcement as an impediment to fair housing.

1

P.C.

562 435 7118

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The Fair Housing Planning Guide states that the jurisdiction responsible for carrying out the AI should have a clear set of objectives, timelines and a process for measuring the success of those objectives. Currently the AI in regards to Lead-based paint and Fair Housing does not provide a work plan to fight the problem of Lead and code enforcement problems in low-income communities. Nor does it make the connection to accessibility and affordability as it relates to the same issues.

1. The AI does not identify how the city will use income data and housing stock data to address the pattern of low-income housing in specific census tracts and the relationship to lead-based paint hazards in that housing.
2. Outside of the mention of Familial Status, the AI does not address trends or patterns of discrimination in low-income communities and how that correlates to the number of housing code violations in high-risk census tracts.
3. The AI does not present a plan for working with government agencies (local and state) or local community groups to remedy code violations, income issues or affordability issues in identified lead burdened census tracts, as is described in the Fair Housing Planning Guide. What agencies will work with the FHF? What are the areas of collaboration?
4. The AI does not address the goal of the Consolidated Plan in developing educational programs, with city departments, for tenants in high-risk communities to learn more about their rights and responsibilities regarding lead poisoning risk assessment and remedy of risks.
5. How will the FHF look at zoning, revitalization and enforcement of housing codes as they relate to Lead in the AI? Long Beach has the 3rd highest rate of poisoned children in the state and 33% of its units (66,000) were constructed before 1950. What is the plan to address this issue?
6. The AI does not present an assessment or evaluation process to monitor progress and achievement of lead-related goals and objectives. How will the FHF measure the impact of their work on accessibility or affordability of housing? How will the effects of education and collaboration be measured? What are the tools to make the assessment?
7. How will the AI objectives meet the objectives of the Consolidated Plan in regards the Lead in housing? How will the FHF monitor the progress?

I appreciate the opportunity to submit these comments.

Sincerely,

Kathleen Overr
Community Health Promoter
Legal Aid Foundation of Los Angeles

cc: Barbara Schull, Fair Housing Foundation

BJ Willis, Development Project Manager
City of Long Beach
Dept. of Community Development
333 W. Ocean Blvd., 3rd Floor
Long Beach, CA 90802



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802

October 16, 2001

Ms. Kathleen Overr
Community Health Promoter
Legal Aid Foundation of Los Angeles
110 Pine Avenue, Suite 420
Long Beach, California 90802-4421

SUBJECT: 2001 Analysis of Impediments to Fair Housing Choice for the City of Long Beach

Dear Ms. Overr:

This letter is in response to your written comments submitted at the September 19, 2001 Community Development Advisory Commission's Public Hearing on the 2001 Analysis of Impediments (AI) to Fair Housing Choice for the City of Long Beach.

We acknowledge that the information provided in the AI study on lead based paint as it relates to fair housing only scratches the surface of this issue. You raise some poignant issues in your comments. Additional information on the City's efforts to address lead based paint issues has been added for the final draft of the study. The following information provides the City's response to each of the seven (7) issues raised in your letter. The format of this letter provides a response to each of the issues you raised.

Issue #1: Typically the individuals that use "low-income" housing are renters and therefore not truly able to make changes and correction to their housing. The City of Long Beach has specific programs in the primarily low-income areas that target the owners of the property to improve the housing. The City also has an Intensified Code Enforcement Program that works within specific areas to ensure that all hosing is brought and maintained at Long Beach City Code.

Issue #2: In constructing the AI, the City of Long Beach looked to identify clear trends and/or patterns of discrimination. The staff welcomes the identification of more current studies conducted that identifies such patterns in the low-income communities area for future review.

Issue #3: The City of Long Beach Health and Community Development Department has programs designed to reduce and eliminate Lead Paint in the homes of Long Beach. The City will continue to aggressively pursue Federal grants to support this effort.

Issue #4: The City of Long Beach has free testing available to children to identify if they have been exposed to lead paint. The AI "Fair Housing Action Plan" will include information about the collaboration between Health and Community Development Departments to educate the community about the dangers of lead paint in Long Beach homes.

Administration (562) 570-6641 • Economic Development (562) 570-3830 • Housing Services (562) 570-6949
Housing Authority (562) 570-6047 • Neighborhood Services (562) 570-6066 • Property Services (562) 570-6809
Redevelopment (562) 570-6615 • FAX (562) 570-6215 • TDD (562) 570-3911

Issue #5, #6, & #7: The City of Long Beach acknowledges that the information provided in the AI study on lead based paint as it relates to fair housing only scratches the surface of this issue. We encourage and welcome the Legal Aid Foundation and all others concerned with this issue to work with the City of Long Beach to address the evaluation and measurement of the effectiveness of education and reduction of lead paint in Long Beach homes.

The City of Long Beach appreciates and commends your effort to improve the lives of the Citizens of Long Beach. We hope to have your continued participation and contributions.

I hope that this provides you with a clear resolution to your concerns. We appreciate your comments and will consider your concerns.

Sincerely,



B.D. Wills
Development Project Manager

MENTAL HEALTH ADVOCACY SERVICES, INC.

A NON PROFIT ORGANIZATION PROVIDING LEGAL SERVICES TO PEOPLE WITH MENTAL AND DEVELOPMENTAL DISABILITIES

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September 18, 2001

Ms. Melanie Fallon, Director
Community Development Department
City of Long Beach
333 West Ocean Blvd., 3rd Floor
Long Beach, California 90802

Via Facsimile and First Class Mail

Re: Comments On Draft Analysis of Impediments to Fair Housing

Dear Ms. Fallon:

Mental Health Advocacy Services, Inc. (MHAS) is a public interest law office providing legal services to individuals with mental and developmental disabilities with an emphasis on using fair housing laws to further housing opportunities for individuals with disabilities. For the past several years, we have worked with both local jurisdictions, primarily in Southern California, and developers of housing for individuals with disabilities to ensure that municipalities' land use and zoning practices comply with both federal and state fair housing laws.

Our office has worked on fair housing issues within the City of Long Beach for several years, addressing the ramifications of PD-30, a temporary moratorium in the downtown area and, more recently, MHAS provided technical assistance to the City of Long Beach in the development of a fair housing reasonable accommodation procedure for inclusion in the municipal zoning code. With this background of experience in the City of Long Beach and a concern for the City's fair housing compliance, we are submitting the following comments on the City's draft Analysis of Impediments to Fair Housing (hereafter "AI"). Our comments are limited to those sections of the AI that implicate housing opportunities for individuals with disabilities.

General Comments Concerning Discussion of Individuals With Disabilities

The AI reports that in the preceding five years, 1996 – 2001, the Fair Housing Foundation of Long Beach opened 70 cases alleging discrimination based on physical and mental disability. This is the third highest basis of complaints, even if one relies only on the number of physical disability based discrimination cases opened by the Foundation. While this is a significant ranking, the commitment to affirmatively further fair housing, in terms of providing fair housing services to specifically combat discrimination against individuals with disabilities and "efforts to identify and eliminate

Ms. Melanie Fallon, Director
September 18, 2001
Page 2

impediments" (pp. 91 - 92), does not address the magnitude of the problems that individuals with disabilities within the City of Long Beach confront in securing affordable and accessible housing that meets their needs.

Analysis of Local Land Use and Zoning Practices

The authors of the AI correctly identify local land use and zoning practices as an impediment to the development and siting of housing for individuals with disabilities (p.80). As noted earlier, MHAS worked with the City of Long Beach to amend the City's zoning code to add a fair housing reasonable accommodation ordinance procedure for individuals with disabilities and developers of housing for individuals with disabilities to seek flexibility in the application of restrictive zoning provisions that inhibit housing development.

While we are very pleased that this ordinance is now employed by the City, we have consistently informed Long Beach that its restrictive use provisions for congregate housing and the frequent imposition of a conditional use permit requirement is in conflict with federal and state fair housing laws because the prohibitions deny housing opportunities to individuals with disabilities. In other words, the existence of a reasonable accommodation procedure does not resolve existing provisions in the City's zoning code that have a discriminatory impact on the development and siting of housing for individuals with disabilities. We assume that the lack of a discussion in this section of the AI of the City's fair housing reasonable accommodation procedure was an oversight and hope that it will be included.

While the City is to be commended for identifying land use and zoning practices as an impediment to fair housing for individuals with disabilities, the analysis falls short in that it only considers "handicapped housing." There is no discussion of the City's two additional use classifications, "special group residence - residential care facility" and "special group care - communal housing." The land use and zoning section of the current draft should be expanded to discuss the code restrictions for these two additional use classifications. Additionally, the AI should consider zoning code definitions that may or may not adversely impact the development and siting of housing for individuals with disabilities. We also note that while both the preceding section of the AI addressing senior housing and, the subsequent section focusing on social service offices include a discussion of "proposed action," the same is not provided for housing for individuals with disabilities.

Accessibility of Housing to People with Disabilities

Background Discussion of the Law

The draft presents an explanation of the federal Fair Housing Act reasonable accommodation and reasonable modification provisions; however, a statement about the

later is incorrect. The AI states at p. 85 that "[a] housing provider may require a tenant to escrow the cost of returning property to its original condition if modifications could not be used by future tenants" This is a misstatement of the law. A tenant is only required to return modified premises to their original condition if the modifications made would interfere with a future tenant's use and enjoyment of the premises. It is very important that the correct standard for the restoration requirement be articulated in the AI.

A subsequent section of the draft AI attempts to distinguish between the protections afforded individuals with disabilities under the Fair Housing Act and the Americans With Disabilities Act (ADA) but, the section is incomplete, confusing and it contains several errors in need of revision. First, the Fair Housing Act applies to private housing as well as public and assisted (subsidized) housing. The draft statement at p. 86 incorrectly states that "[t]he FHA covers private housing."

Second, the explanation of the ADA is confusing, primarily because it is incomplete. The key distinction between the Fair Housing Act and the relevant sections of the ADA is that the former applies to residential dwellings and the latter covers the activities of state and local governments and, the buildings in which they operate, under Title II and public accommodations, pursuant to Title III. No clear definition of "public accommodations" is provided for the reader. The ADA is a complex area of law and the drafters may want to re-evaluate how this section is presented, if at all.

Finally, the draft indicates that fair housing laws apply to homeless shelters (p. 86). This statement may or may not be correct depending on the nature of the shelter and how long an individual may reside there. It is also possible that both the Fair Housing Act and the ADA apply to a homeless shelter: the part of the building where the individuals reside may be covered by the Fair Housing Act and the portion of the building where services are provided is subject to the ADA, Title III. Based on the foregoing analysis, we suggest that homeless shelters are not a clear example to use in the AI.

Compliance with Accessibility Requirements

This section of the draft correctly identifies the importance of providing housing that is accessible to individuals with physical disabilities and raises the problem of local building codes not referencing the Fair Housing Act requirements (p. 87). It is also possible that the City is inadvertently approving plans without ensuring compliance with the law and that this omission is contributing to compliance problems. The AI should consider this possible impediment and suggest that the City review how residential building plans are approved, whether compliance with accessibility requirements is part of the plan check process and whether personnel in the department are in need of training on the requirements of the law. Any additional impediments identified in this area should also be addressed in the goals and objectives section of the AI.

Ms. Melanie Fallon, Director
September 18, 2001
Page 4

The problem of providing accessible housing is actually two-fold. Ensuring that new construction meets the accessibility requirements of the law is essential. However, many residential buildings not subject to the requirements of the law must be made accessible to individuals with physical disabilities to meet the housing demands in Long Beach. To address this impediment, the City of Long Beach should develop financial resources and make funds available directly to tenants to make modifications for physical accessibility. Additionally, the City should develop financial incentives for landlords to modify their multi-family residential dwellings to increase the supply of rental housing that is accessible to individuals with physical disabilities. As noted below, the AI should recommend developing both of these programs to further fair housing for individuals with disabilities in the City of Long Beach.

Efforts to Identify and Eliminate Impediments to Fair Housing Choice

The Department of Housing and Urban Development (HUD) has indicated in its Fair Housing Planning Guide that a jurisdiction in developing its action plan must define a clear set of objectives with measurable results that it intends to achieve. Each objective must have a goal with milestones toward achieving the objective including a list of actions to be completed and a timeline for completion.

The activities related to eliminating impediments to fair housing for individuals with disabilities fall far short of HUD's specificity mandate. For example, the "Revisions to the Zoning Code" section, at p. 93, merely states that the findings of the AI are to be presented to the Zoning Administrator and that the Zoning Administrator is to be "worked with" to amend the code to ensure compliance with fair housing laws. More specific information must be provided in the AI as to what sections of the code need to be amended, who will oversee this process and when it is anticipated that this objective will be accomplished.

The section addressing accessible housing in the City of Long Beach presents the same shortcomings as discussed immediately above. Who will oversee this effort? What is the timeline for completion of the objectives to further the development of accessible housing? Additionally, the suggestions presented earlier in this letter concerning accessible housing should be incorporated into this section of the AI.

Lack of Discussion of the Housing Authority of the City of Long Beach

The draft AI has no discussion of the role of the City's Housing Authority in affirmatively furthering fair housing. It is well known that individuals with disabilities are disproportionately low income and therefore public housing and other assistance programs operated by the City's Housing Authority provide a possible source of affordable housing. However, what is not known from this draft AI is the Agency's effectiveness in furthering its federal fair housing mandate. Does the Agency have practices and procedures in place to address complaints of housing discrimination? Are there a sufficient number of accessible units available to individuals with disabilities and,

Ms. Melanie Fallon, Director
September 18, 2001
Page 5

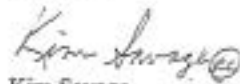
if not, is Section 504 money available to retrofit units? There are a multitude of questions that the AI must explore in its review of the City's Housing Authority.

Public Participation Requirement for Analysis of Impediments

In its Fair Housing Planning Guide, HUD states that since fair housing planning is a component of the Consolidated Plan (Con Plan), the citizen participation requirements of the Con Plan set forth in the federal statute apply to the development of the AI. (Fair Housing Planning Guide at p.4-3.) The Con Plan citizen participation requirements are set forth in highly detailed regulations and mandate wide circulation of a draft document and a public hearing process. Jurisdictions must provide sufficient time between circulation of a draft AI and the scheduling of a public hearing so that individuals and interested groups have a genuine opportunity to review and comment on the document. Additionally, there must be a time period between public hearings and City's adoption of an AI so that the comments of citizens may be carefully considered and, where appropriate, incorporated into the AI. We are not aware that the City of Long Beach has developed a public participation plan thus far nor, widely circulated this draft to interested individuals and groups in the community. We urge the City of Long Beach to follow the Con Plan public participation requirements in all further developments of its AI.

We appreciate the opportunity to provide the City of Long Beach with comments on its draft AI. If you have any questions concerning the above or are in need of any additional information, please do not hesitate to contact me.

Sincerely,



Kim Savage
Senior Attorney

KS:rc

cc: Barbara Shull
B.J. Wills



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802

October 16, 2001

Ms. Kim Savage
Senior Attorney
Mental Health Advocacy Service, Incorporated
1336 Wilshire Boulevard, Suite 102
Los Angeles, California 90017

SUBJECT: 2001 Analysis of Impediments to Fair Housing Choice for the City of Long Beach

Dear Ms. Savage:

This letter is in response to your written comments submitted at the September 19, 2001 Community Development Advisory Commission's Public Hearing on the 2001 Analysis of Impediments (AI) to Fair Housing Choice for the City of Long Beach.

The City of Long Beach appreciates your review and analysis of the information included in this AI study and regrets not having the opportunity to incorporate your expertise at an earlier stage in the process of developing this AI study. Based on your written comments, we have made adjustments to the final draft related to factual misrepresentations and/or unintended omissions. The following information provides the City's response to each of the seven (7) issues raised in your letter. The format of this letter provides a response to each of the issues you raised.

Issue #1: This AI study includes a good deal of information on some of the issues that serve as impediments to fair housing choice for people with disabilities. The City of Long Beach is working hard to eliminate impediments to those individuals with disabilities, mental or physical. However, we acknowledge that a great deal more needs to be done to ensure equal access to housing opportunities in this community as it relates to people with disabilities. We encourage Mental Health Advocacy Services and all others concerned to work with the City of Long Beach in a more comprehensive review of the specific issues and concerns affecting fair housing choice for people with disabilities in this community.

Issue #2: The City of Long Beach commends Mental Health Advocacy Services for their work to establish a reasonable accommodation ordinance in Long Beach. The City looks forward to continuing our work with Mental Health Advocacy Services to further reduce resolve the potential for discriminatory application of land use and zoning practices as it impacts housing for people with disabilities. You correctly identify an unintentional omission on our part in the section on "handicapped housing". This has been corrected in the final document.

Issue #3: You correctly point out some factual misrepresentation in this section. We have attempted to address some of these issues in the final document.

Issue #4: The City of Long Beach believes that we have addressed this issue in the AI study but certainly welcomes your additional comments.

Issue #5: The issues and recommendations for actions cited in The Fair Housing Plan section of the AI Study are presented as a starting point for the City of Long Beach. We are confident that we have prepared a thorough and comprehensive analysis of some of the barriers to fair housing in the City of Long Beach. However, we are engaging in an on-going process to develop actions to address fair housing issues and concerns.

Issue #6: The purpose of the study is to prepare a thorough and comprehensive analysis of the barriers to fair housing choice in the City of Long Beach. The Long Beach Housing Authority is not a barrier and therefore not identified in the AI. The United States Department of Housing and Urban Development strictly enforces that the Housing Authority provide them with practices and procedures to address housing discrimination.

Issue #7: We have added a section in the Introduction and Executive Summary section of the AI study on Public Consultation and Community Input.

We want to reiterate that we are confident that the 2001 Analysis of Impediments to Fair Housing Choice in the City of Long Beach is a thorough and comprehensive analysis of fair housing issues and concerns in the community. We hope that all those concerned with fair housing in this community will work together to address the barriers to fair housing choice identified in this study along with other concerns as they are identified.

The City of Long Beach appreciates and commends your effort to improve the lives of the citizens of Long Beach. We hope to have your continued participation and contributions.

Sincerely,



B.J. Wills
Development Project Manager



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802

October 16, 2001

Mr. Dennis L. Rockway
Director of Advocacy and Training
Legal Aid Foundation of Los Angeles
110 Pine Avenue, Suite 420
Long Beach, California 90802-4421

SUBJECT: 2001 Analysis of Impediments to Fair Housing Choice for the City of Long Beach

Dear Mr. Rockway:

This letter is in response to your written comments submitted at the September 19, 2001 Community Development Advisory Commission's Public Hearing on the 2001 Analysis of Impediments (AI) to Fair Housing Choice for the City of Long Beach.

The following information provides the City's response to each of the nine (9) issues raised in your letter. The format of this letter provides a response to each of the issues you raised.

Issue #1: The HUD Fair Housing Planning Guide, Volume I, includes a vast array of information "suggested" for inclusion in an Analysis of Impediments study. HUD officials acknowledge that this is meant as a "guide" and that all of the "suggested" items may not be included in a single analysis study. The issues and recommendations for actions cited in The Fair Housing Plan section of the AI Study are presented as a starting point for the City of Long Beach. The City of Long Beach has developed a specific "Fair Housing Action Plan" to address the impediments identified in the study to be implemented within the next year.

Issue #2: While the 1989 study used as background information in this study is twelve years old, the findings from this comprehensive national study that included components conducted in the Metropolitan Los Angeles/Long Beach region are still very relevant and applicable today. We welcome the identification of more current studies conducted in this area for future review.

Issue #3: Participants in our focus groups were assured that they will not be identified by name or linked to specific comments in order to promote free and open dialogue during the sessions. However, information has been added to the introduction of the focus group with housing professionals' section to identify the professional capacity of the participants. This section serves a useful purpose in that it helps identify the evolving views of professionals in the housing industry as well as raise flags regarding questionable practices that continue to pose barriers to fair housing choice. A number of comments in this section are consistent with findings supported by the data gathered for this study.

Issue #4: Information was prepared on this issue for the AI study and omitted in the final editing. We would be happy to include our analysis of this issue in the study.

Administration (562) 570-6841 • Economic Development (562) 570-3830 • Housing Services (562) 570-4848
Housing Authority (562) 570-6047 • Neighborhood Services (562) 570-6055 • Property Services (562) 570-4808
Redevelopment (562) 570-6615 • FAX (562) 570-6215 • TDD (562) 570-2811

Issue #5: The AI study does identify the use classification of "Social Service Office" as an impediment starting on page 83. We did not have information on the specific issue cited in the comments at the time that we were developing this study.

Issue #6: We acknowledge that the issue of Lead Paint in housing as a fair housing issue. The City of Long Beach has specific Health and Community Development Departments programs designed to reduce and eliminate Lead Paint in the homes of Long Beach. The City of Long Beach also has free testing available to children to identify if they have been exposed to lead paint. The City will continue to aggressively pursue Federal funding to expand this effort.

Issue #7: We have added a section in the Introduction and Executive Summary section of the AI study on Public Consultation and Community Input.

Issue #8: The HUD Fair Housing Planning Guide, Volume I, includes a vast array of information "suggested" for inclusion in an Analysis of Impediments study. HUD officials acknowledge that this is meant as a "guide" and that all of the "suggested" items may not be included in a single analysis study.

We are confident that we have prepared a thorough and comprehensive analysis of some of the barriers to fair housing choice in the City of Long Beach. We regret that we are unable to include an examination of every possible issue and concern related to fair housing choice in this study. However, we encourage all those concerned to engage in an on-going process to analyze possible barriers to fair housing choice and develop actions to address fair housing issues and concerns in our community.

Issue #9: There is an ongoing debate as to whether the refusal to accept Section 8 vouchers in and of itself constitutes a violation of fair housing laws. We encourage on-going dialogue on this issue.

The City of Long Beach appreciates and commends your effort to improve the lives of the citizens of Long Beach. We hope to have your continued participation and contributions.

I hope that this provides you with a clear resolution to your concerns. We appreciate your comments and will consider your concerns.

Sincerely,



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Development Project Manager

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Our File Number

November 14, 2001

Melanie Fallon
Director, Department of Community Development
City of Long Beach
333 West Ocean Blvd., 3rd Floor
Long Beach, CA 90802

RE: 2001 Long Beach Analysis of Impediments

VIA FACSIMILE: 562.570.6215

Dear Ms. Fallon:

Thank you for your comments on my letter regarding the Fair Housing Analysis of Impediments. I am submitting additional comments in response to your letter dated October 16, 2001 and to the revised section of the AI pertaining to lead-based paint.

While Code Enforcement efforts and Community Development efforts have been commendable, without increased enforcement and prosecution property owners will continue to flip properties and abandon communities, ultimately leaving the City with the bill, and many tenants evicted and out on the streets.

- What is the current plan to address slum owners who are repeat offenders? Tenants fear that any complaint will put them 30 days from living on the street.
- What methods shall be implemented to investigate patterns of property abandonment? What will be the enforcement process?

The funding you refer to in your letter applies to current policy that only addresses lead paint hazards after a child is already poisoned. Long Beach Code Enforcement has the authority to reduce and eliminate lead paint hazards through existing municipal code and should not wait have to wait for a child to be poisoned to address the hazards.

LBMC: Section 8.76.010 -- "It is a public nuisance for any person causing the following conditions on any premises: -(B) Any building on which the condition of the paint has become so deteriorated as to permit, decay, excessive chipping, cracking or warping so as to render the building unsightly and in a state of disrepair".

Assume the existence of lead-based paint if the property is constructed or remodeled prior to 1980, and order-work to be done in a lead-safe manner. Failed paint is a nuisance, period. As a nuisance, it is enforceable and prosecutable.

The compartmentalization of a response to failed paint, the lack of funding to low-income owners of properties, the lack of enforcement when hazardous conditions exists, combined with a health department process that uses

a child like a canary in a coal mine, act as impediments themselves and further limit the number of units affordable to low-income tenants and continue to put at risk the health of the tenants.

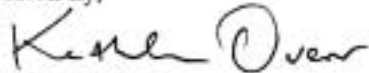
While the City of Long Beach provides free lead screening, it is state law that all children, with or without insurance are eligible and should be tested. As mentioned above, current policy of the City of Long Beach Health and Community Development departments does not require action to abate lead hazards until a child has tested at a lead level of 20 ug/dL (micrograms per deciliter of blood). Recent studies have shown that a child suffers a loss of cognitive development skills at a level of 5 ug/dL. While education of lead hazards is the city's perception of prevention, education as a means of prevention has not proven effective for children with low lead levels, as it has for children with levels of 15 ug/dL or higher. True prevention occurs when we make our housing lead-safe and Long Beach has made great strides towards that goal. However, lead-based paint hazards are housing issues with severe health consequences, yet we still use children as lead detectors when we should be putting our efforts towards preserving our housing stock and making all housing lead-safe.

The AI very clearly lays out the law as it relates to lead-based paint, but it does not lay out a plan of action to prevent the potential for harassment or eviction and how it will address slum properties.

- How will the City of Long Beach work to educate property owners of their responsibilities of disclosure of lead hazards and the tenants right to know?
- What is the City's plan to address the harassment of tenants and as it relates to the disclosure rule?
- How will the City of Long Beach enforce habitability violations and secure tenants rights to request repairs?
- What plan does the City of Long Beach have for increasing the numbers of units made lead-safe?

I appreciate the opportunity to submit these comments.

Sincerely,



Kathleen Overr
Community Health Promoter
Legal Aid Foundation of Los Angeles

cc: Barbara Schull, Fair Housing Foundation

BJ Wills, Development Project Manager
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Dept. of Community Development
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November 15, 2001

Mr. B.J. Wills, Development Project Manager
Ms. Melanie Fallon, Director
Community Development Department
City of Long Beach
333 West Ocean Blvd., 3rd Floor
Long Beach, California 90802

Via Facsimile and First Class Mail

Re: Comments On Revised Draft Analysis of Impediments to Fair Housing

Dear Mr. Wills and Ms. Fallon:

Mental Health Advocacy Services Inc. (MHAS) has reviewed both the City's revised draft Analysis of Impediments to Fair Housing (AI) and your October 16, 2001 letter responding to our specific comments on those sections of the draft that identify barriers to the development and availability of housing opportunities for individuals with disabilities in the City of Long Beach. We are pleased that the City considered our comments in revising the AI and note that the current draft corrects those explanations of fair housing laws that MHAS pointed out as inaccurate or incomplete.

However, after reviewing the revised draft AI and considering the City's process for developing the AI, MHAS continues to have concerns in three critical areas: (1) the AI does not consider the role of the Long Beach Housing Authority in affirmatively furthering fair housing for individuals with disabilities; (2) the revised draft fails to provide any further detail as to how the City will address identified impediments to fair housing for people with disabilities and; (3) despite additional written information on public consultation and community input, it is our position that the public process for reviewing and commenting on the City's AI is inadequate.

The Analysis of Impediments Should Consider The Role of The Long Beach Housing Authority In Furthering Fair Housing.

The Long Beach Housing Authority administers a variety of critically needed subsidized and assisted housing programs that are intended to provide affordable and accessible housing for individuals with disabilities. Not only must the Agency comply with federal and state fair housing laws, but as a recipient of federal funds, the Housing Authority has a statutory mandate to affirmatively further fair housing.

The City in identifying impediments to fair housing should consider the Housing Authority's policies, practices and procedures in administering its housing programs to

Mr. B.J. Wills, Development Project Manager
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determine whether or not the Agency's operations in any way adversely impact fair housing opportunities. While the City of Long Beach may contend that "the Long Beach Housing Authority is not a barrier . . . and [HUD] strictly enforces that the Housing Authority provide them with practices and procedures to address housing discrimination," there is no information in the draft AI to suggest that the City even considered whether any of the Housing Authority's policies, practices and procedures might be a potential impediment to fair housing.

Additionally, reliance on HUD as the overseer of local housing authority compliance with anti-discrimination practices and procedures is misplaced. Several years ago, HUD essentially "de-regulated" local housing authorities, transferring to them the authority to develop in many areas their own policies and procedures, including for example, applicant preferences and waiting list management. Many of these areas of local decision-making potentially impact the furthering of fair housing for individuals with disabilities. As the Long Beach Housing Authority is now required to prepare an agency plan, review of this document should be a starting point for considering fair housing impediments.

The Revised AI Continues to Lack the Specificity Required To Eliminate Impediments to Fair Housing.

The Department of Housing and Urban Development (HUD) has indicated that fair housing planning is the "cornerstone" of an effective Fair Housing Plan. To be effective, fair housing planning, which starts with an Analysis of Impediments, requires a clear set of realistic goals with measurable results directly related to the identified impediments to fair housing choice. According to HUD, a jurisdiction should establish "milestones, timetables and measurable results" that it will undertake to address identified impediments. More specifically, HUD has directed that in their fair housing actions, jurisdictions should:

- List fair housing actions to be completed for each objective;
- Determine time periods for completion;
- Identify public and private resources that will finance or otherwise support fair housing actions;
- Identify groups and organizations that will be involved in each action and obtain commitments for their involvement and;
- Set priorities and schedule actions for a time period that is consistent with the jurisdiction's Consolidated Plan cycle.

(Fair Housing Planning Guide, § 2.10.)

Although HUD has clearly indicated that jurisdictions must detail their fair housing objectives and set forth their intended actions with timelines for accomplishing their goals, the City of Long Beach has not provided this essential information in its draft

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AI. For example, although the City correctly identifies restrictive land use and zoning regulations as an impediment to the development of housing for individuals with disabilities, the only actions proposed to overcome this impediment are to present the AI findings to City Zoning officials and work with officials to amend the code for compliance with fair housing laws. (Revised Draft AI at 98.) These plans lack the necessary detail for measuring progress or successful results in eliminating the identified impediment. Additionally, the plan lacks a timeframe for accomplishment of the goal so there is no accountability for completing the tasks to be undertaken. The requisite specificity outlined by HUD in its Fair Housing Planning Guide is also lacking in the City's plans to address accessible housing for people with disabilities (Revised Draft AI at 98.).

We urge the City of Long Beach to further develop its fair housing action plan by: (1) adding the specific steps necessary for effectively eliminating each identified impediment; (2) establishing timetables for completing identified tasks; (3) developing criteria for determining its effectiveness in overcoming identified impediments and; (4) identifying City staff and departments responsible for overseeing the tasks and those agencies and organizations in the community which will assist in this process.

The Citizen Participation Requirement Has Not Satisfied By The City of Long Beach In Its Development and Review of the AI.

From the initial development of the AI, there has been a concern as to whether the City of Long Beach has adequately involved the community in the public process, from information gathering to document review and public comment. Now that a draft AI has been issued, MHAS and others reviewing the draft AI have their first opportunity to evaluate how the City has involved interested community organizations, agencies and individuals in the impediments analysis.

HUD has indicated that because the AI is a component of the Consolidated Plan, the citizen participation requirements apply. However, "[s]ince FHP and the Consolidated Plan are on a different time schedule for the first cycle, HUD does not expect the jurisdiction to follow the strict citizen participation requirements for their first ... AI." (Fair Housing Planning Guide at 4-3) The City of Long Beach, apparently relying on this later statement, contends that with a relaxed citizen participation requirement, it has done all that is necessary to involve the public in the development and review of the AI. MHAS disagrees with this conclusion for several reasons.

First, the City has not developed an AI through a "clear, and continuous exchange of concerns, ideas, analysis and evaluation of results" process. (Revised Draft AI at 9.) While the City identifies numerous "stakeholders" with whom it conducted interviews, the level of discussion that actually took place is unclear. For example, this office has been identified as a stakeholder on disability issues yet no interview was conducted with MHAS about the City's development of its AI. MHAS was asked by another law office

Mr. B.J. Wills, Development Project Manager
Ms. Melanie Fallon, Director
November 15, 2001
Page 4

to review the City's draft AI after it was prepared and to provide comments in our areas of expertise.

Second, it appears that once the City conducted its interviews with those it identified as interested stakeholders, the citizen participation process stopped. There is no record that the City circulated its draft AI to anyone other than City officials and the Community Development Advisory Commission (CDAC). A common sense approach to public participation is to provide those interviewed with a copy of the draft AI for their review, comment and further input.

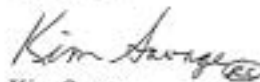
Third, there is no record of the City holding any public hearings to discuss the draft AI and obtain comment and additional input from the community, nor has the City indicated that it intends to do so now that a draft has been prepared. Public hearings are an essential element of even a relaxed citizen participation process yet introducing the AI to the CDAC and requesting that this appointed body approve the five-year fair housing planning document does not meet this mandate.

Furthermore, at the September 19th CDAC meeting, advocates who requested time to address the Commission and provide public comment in this limited forum were told by the City that they could not speak. Although this matter was subsequently discussed with the City, the initial attempt by the City to stifle public comment indicates that the City may not be truly interested in having a "clear, and continuous exchange of concerns, ideas, analysis and evaluation of results" process.

To remedy the foregoing, the City should circulate for review its draft AI to previously interviewed stakeholders and to community organizations and agencies and also hold public hearings to obtain comments and additional input from the public. Without these additional steps, the City's citizen participation process remains inadequate.

MHAS urges the City to consider the foregoing comments with the goal of strengthening the City's fair housing planning obligations and satisfying its statutory mandate to affirmatively furthering fair housing for individuals with disabilities, all of which must be documented in its Analysis of Impediments.

Sincerely,



Kim Savage
Senior Attorney

KS:rc

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November 9, 2001

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RE: COMMENTS ON THE CITY OF LONG BEACH'S REVISED ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

Dear Mr. Wills:

Legal Aid has reviewed the City of Long Beach's revised Analysis of Impediments to Fair Housing Choice ("revised AI"). We are disappointed to find that the City has rejected our recommended changes. We offer the following comments regarding the revised AI.

1. The City is mistaken in its allegation that the Fair Housing Planning Guide ("FHPG") merely provides jurisdictions with suggested information for inclusion in the AI. Although some parts of the FHPG may be suggested, the Guide is extremely clear in stating that the AI must "define a clear set of objectives with measurable results that it intends to achieve." (FHPG, p. 2-22). For each objective, the FHPG provides that the AI should "determine the time period for completion" and a "process for monitoring the progress in carrying out each action and evaluating its effectiveness." (See FHPG, p.2-22 - 2-23, attached hereto as Exhibit A). While the City of Long Beach's 2001 AI discusses many positive objectives, it falls short in developing a time period for completion and a process for monitoring the progress of those objectives. The AI in many places, therefore, lacks the specificity of detail required by HUD. This specificity of detail is not "suggested." It is required.

On February 14, 2000, HUD issued a Memorandum to its Field Offices regarding AIs. In this Memorandum, HUD discussed the purpose of the FHPG. HUD

explained that: "In response to requests from state and local governments, the Department developed a Fair Housing Planning Guide and training program to assist in fair housing planning and in fulfilling the fair housing requirements of the Consolidated Plan and Community Development Block Grant Regulations. The Guide provides information on how to conduct a an AI, undertake activities to overcome identified impediments, and maintain documentary records. The Guide should be used by state and local governments to conduct or update their AIs." (See Memorandum from HUD, dated February 14, 2000, attached hereto as Exhibit B).

The City has failed to follow the FHPG's instruction that the AI provide a clear set of objectives, with measurable results that it intends to achieve and a process for monitoring progress.

In our comments on the draft AI, we set forth the areas in which the AI lacks the specificity of detail required by the FHPG. The City has not adopted any of our recommended changes regarding this matter, therefore they are restated below:

- a. On page 37, the revised AI provides that there are segregation patterns within the City of Long Beach. The eastern part of the City, for example, is populated primarily by Whites. The AI recommends that the City take a close look at this issue to ensure that equal housing opportunities are available in the eastern part of the City. The AI fails, however, to suggest how this problem should be studied, when it should be studied or what should be done with the results of the study. Although the AI discusses this issue further on page 96, it still fails to provide a sufficient level of detail.
- b. On page 72, the revised AI provides that the City should establish a "No Tolerance of Predatory Lending" educational campaign. The AI fails, however, to provide a timetable for the campaign. It also fails to explain who will develop the educational materials for the campaign, who will be targeted by the campaign, how many people the campaign hopes to reach and how the effectiveness of the campaign will be measured.
- c. On page 78, the revised AI provides that evidence suggests there may be a systematic practice of discriminatory lending in the City. The AI states that a more detailed study and analysis is necessary to determine if this is true. The AI fails, however, to provide how this study should be conducted, when it should be conducted and what should be done if the results of the study confirm the existence of discriminatory lending practices. The AI further discusses discriminatory lending practices on page 97, yet this discussion also lacks the specificity of detail required by the FHPG.
- d. On page 78, the revised AI states that at the very least, "data suggests that a stronger effort should be made to promote homeownership opportunities

and encourage improved lender performance in awarding credit to African American and Hispanic/Latino households." The AI does not suggest who should promote these opportunities or how these opportunities should be promoted. The AI also fails to provide a timetable for promoting these opportunities and a means by which the success of promoting these opportunities can be measured.

- e. On page 95, the revised AI lists the services provided by the Fair Housing Foundation to the City of Long Beach. While this list encompasses many worthy objectives, there is no level of detail provided as to how these objectives will be carried out, when they will be carried out or how their success will be measured. More detail is needed. The AI states, for example, that the Fair Housing Foundation will: "Provide education, training and outreach regarding Fair Housing laws and issues of cultural sensitivity for local realtors, rental property owners, managers, and agents." This objective is too vague. The AI should explain how many realtors, landlords, etc. will be targeted; it should explain how these realtors, landlords, etc. will be targeted; and it should state how the success of the education, training and outreach will be measured.
- f. On page 96, the revised AI provides that the City should investigate and address evidence of differential treatment faced by African Americans in the rental housing market. The AI fails, however, to provide any level of detail regarding how this investigation should be conducted and how the problem of differential treatment, if confirmed, will be addressed.
- g. On pages 13-14 and 96, the revised AI explains that female headed households face a disproportionate number of housing issues in the City. The AI states that this trend is alarming and that it requires an in depth study by the City, yet the AI fails to describe the type of study necessary. It also fails to set a timeline for conducting such a study.
- h. On page 97, the revised AI states that the City should expand its promotion of fair housing choice in the Long Beach housing market. This recommendation is made, in part, as a result of the fact that Asian and Hispanic/Latino households are underrepresented amongst those reporting housing concerns or complaints. (See revised AI p. 14). The AI recommends, amongst other things, PSA's and expanded outreach to attain fair housing choice for all. More specificity is necessary, however. The AI should discuss the subject of the PSA's, how many PSA's will be developed over the next year, the target audience of the PSA's and how success of the PSA's will be measured. The AI should similarly explain how the targeted outreach will be conducted to Asian and Hispanic/Latino households, with a timeframe for when the outreach will be conducted and a means for measuring the success of the outreach.

2. On pages 53-56 of the revised AI, the City relies upon the Housing Discrimination Study of 1989. As we stated in our comments on the draft AI, this study is twelve years old and is therefore outdated. The AI should rely on more recent studies. The City claims there are not any more recent studies available. If this is true, then the City should conduct such a study.
3. On pages 63-68, the revised AI discusses information obtained at a focus group of housing professionals. As we stated in our comments on the draft AI, the purpose of this section of the AI is unclear, as it does not address impediments to fair housing in the City. Although the city added one sentence on page 63 of the revised AI, which provides the professional capacity of the individuals who participated in the focus group, the information in this section is still of limited use. Information should have been provided regarding the methodology used to record the statements of the attendees.
4. In our comments on the draft AI, we stated that the AI was deficient because it failed to discuss the impact of the City's zoning on homeless shelters. The City's zoning code, for example, requires homeless shelters to obtain a conditional use permit, whereas hotels are not required to do so for the same land use (i.e., temporary housing). Although the City added a section to the revised AI regarding emergency shelter and transitional housing, the AI still falls short on this topic because it does not address the fact that homeless shelters are required to obtain conditional use permits, whereas hotels are not required to do so. This is an impediment to fair housing that should be addressed in the AI.¹
5. On pages 83-87, the revised AI discusses the impact of local land use and zoning practices, yet fails to address the fair housing implications of the recently passed Anaheim Street Moratorium (Ordinance No. C-7751). This Moratorium prohibits social services, along with gun and alcohol sales, on a significant portion of Anaheim Street in the City of Long Beach. The Moratorium is problematic for two reasons. First, the moratorium fails to provide a definition of what constitutes a "social service." The moratorium is therefore too broad, as it impedes efforts to provide even the least disruptive and critically needed social services to low-income individuals. Second, the moratorium's prohibition against social services is an impediment to fair housing because the moratorium makes social services inaccessible to low-income residents living in the area, which disproportionately impacts women and minorities.

Although we pointed out this deficiency in our comments on the draft AI, the City failed to address the impact of the Moratorium in the revised AI. In its reply to our comments on this issue, the City stated that it did not include an analysis of the Moratorium because it did not have information about it at the time the AI was developed. The City's reply is inadequate. Information was available

¹ At the time I received the Final AI, this new section regarding Emergency Shelter and Transitional Housing was not in the AI. It was sent to me under separate cover. The City informed me that it intended to include this section in the final AI.

regarding the Moratorium at the time the AI was being developed, and it is currently available. The Moratorium is a serious impediment to fair housing choice that should be addressed in the AI.

6. In our comments on the draft AI, we stated that although the AI briefly discussed the issue of lead-based paint, the discussion was insufficient because it did not discuss the disparate impact that lead-based paint has on minorities, nor did it suggest ways to combat lead as an impediment to fair housing. The City made minor revisions to the AI regarding this issue, yet the revisions are inadequate. The AI is still deficient on this topic, as it does not set concrete objectives to battle the City's lead problem, develop a timetable for meeting those objectives and describe a way in which the success of those objectives can be measured. Long Beach has the third highest rate of lead poisoning among children in the State of California. Lead is an impediment to fair housing that should be thoroughly addressed in the City's AI.
7. In our comments on the draft AI, we noted that the FHPG, on page 2-21 (attached hereto as Exhibit C), provides that once the AI is complete, cities should communicate the results of the AI to policy makers, key government staff, community organizations and the general public. The FHPG further provides that cities should provide copies of the AI to all organizations and individuals who contributed to it, that cities should advise the general public about the AI by holding public forums in accessible meeting facilities with interpreters, and that key aspects of the AI should be publicized. We noted in our comments that the draft AI did not mention whether the City had complied with these duties. We recommended that a section be added to the AI to address what the City has done, or will do, to satisfy these duties. The City responded to our recommendation by adding a new section to the AI entitled Public Consultation and Community Input, which is located at pages 9-11 of the revised AI.

The City's discussion regarding Public Consultation and Community Input is both insufficient and inaccurate. First, the draft AI, which should have been distributed throughout the City, was sent only to myself. Second, there are not any community organizations listed on the City's distribution list for distribution of the final AI (see p. 11 of the revised AI). Third, there is no plan to distribute the results of the final AI to the general public. Fourth, on page 11 of the revised AI, it states that all written comments are attached to the AI as Appendix B. Appendix B, however, does not contain written comments submitted by Kathleen Overr and myself from the Legal Aid Foundation of Los Angeles, nor does it include comments submitted by Kim Savage of Mental Health Advocacy Services. All three of us submitted comments on both the draft AI and the final AI and our comments should be included in Appendix B.

Fifth, the information in the section regarding Public Consultation and Community Input is inaccurate, as it provides false information regarding the citizen participation process for the AI. On page 9 of the revised AI, the City

states that HUD does not expect jurisdictions to follow the same strict citizen participation requirements of the Consolidated Plan with the AI. This statement is simply not true. The FHPG, on page 4-3, provides that "[t]he Consolidated Plan's certification to affirmatively further fair housing (AFFH) requires Entitlement jurisdictions to undertake Fair Housing Planning (FHP). *Since FHP is a component of the Consolidated Plan, the citizen participation requirement for the Con Plan applies* (24 CFR 91)." The City's statement that the citizen participation requirements of the Consolidated Plan do not apply is therefore false. (Page 4-3 of the FHPG is attached hereto as Exhibit D).

8. In our comments on the draft AI, we noted that On February 24, 1997, the Director of HUD's Civil Rights Division sent a letter to Mr. James Hankla, City Manager of the City of Long Beach at that time. In this letter, HUD commented on the City's 1996 AI. HUD stated that the City's 1996 AI "does not include many of the areas that ought to be analyzed" and that it "was not conducted in a manner called for in the Fair Housing Planning Guide." (A copy of this letter from HUD is attached hereto as Exhibit E. See pages 2-4 of the letter for HUD's discussion of the City's AI). Although some of the deficiencies listed in HUD's letter were remedied in the 2001 draft AI, we pointed out in our comments that the following deficiencies remained:

- a. The AI does not discuss policies and practices that connect transportation and social services with housing opportunities.
- b. The AI does not discuss whether government services are provided equally throughout all neighborhoods.
- c. The AI does not discuss the policies and practices of local public housing agencies. The AI should discuss the policies and practices of the Long Beach Housing Authority and the Housing Authority of the County of L.A. ("HACOLA").

The City did not include an analysis of these impediments to fair housing in its 2001 AI as requested by HUD. In its reply to our comments on this matter, the City stated that it is "unable to include an examination of every possible issue and concern related to fair housing choice." The City's reply is extremely troublesome in light of the fact that HUD has asked the City, in writing, to provide an analysis of these impediments to fair housing in its AI. The City should have included such an analysis in its 2001 AI.


9. In our comments on the draft AI, we noted that the AI failed to discuss California Civil Code Section 1954.535, which makes it illegal to discriminate based on source of income. Section 8 Vouchers have been interpreted to constitute source of income. Many argue, accordingly, that it is illegal for landlords to refuse to rent to Section 8 voucher holders. We noted in our comments on the draft AI that the City failed to address this issue. In its reply to our comments, the City stated

that it did not include a discussion regarding this topic because there is an ongoing debate as to whether refusal to accept Section 8 constitutes a violation of fair housing laws. The City's reply is inadequate. Even if there is an ongoing debate on this topic, a discussion of this impediment to fair housing, along with a discussion of any surrounding debate, should have been included in the AI.

10. The City's failure to make any of our recommended changes to the AI constitutes a failure on the part of the City to have a "clear and continuous exchange of concerns, ideas, analysis, and evaluation of results" as is required by the FHPG (p.2-12, attached hereto as Exhibit F). The FHPG specifically states that jurisdictions should obtain input from advocacy groups such as Legal Aid (FHGP, p. 2-13, attached hereto as Exhibit G). The City's failure to adopt our recommended changes not only violates the requirements of the AI as set forth in the FHPG, but also the citizen participation requirements set forth at 24 CFR 91.100(a)(1) and 91.105. These Code of Federal Regulations sections provide, in short, that in drafting AIs, cities should consult with public and private agencies that provide social services. Cities are required, moreover, to encourage citizen participation in developing the AI. According to 24 CFR 91.500, HUD may disapprove of an AI if it was developed without the required citizen participation and consultation.

Thank you for your consideration of our comments.

Sincerely,



Dennis Rockway
Director of Advocacy and Training

Attachments

CC: Melanie Fallon
Barbara Shull
Don Smith

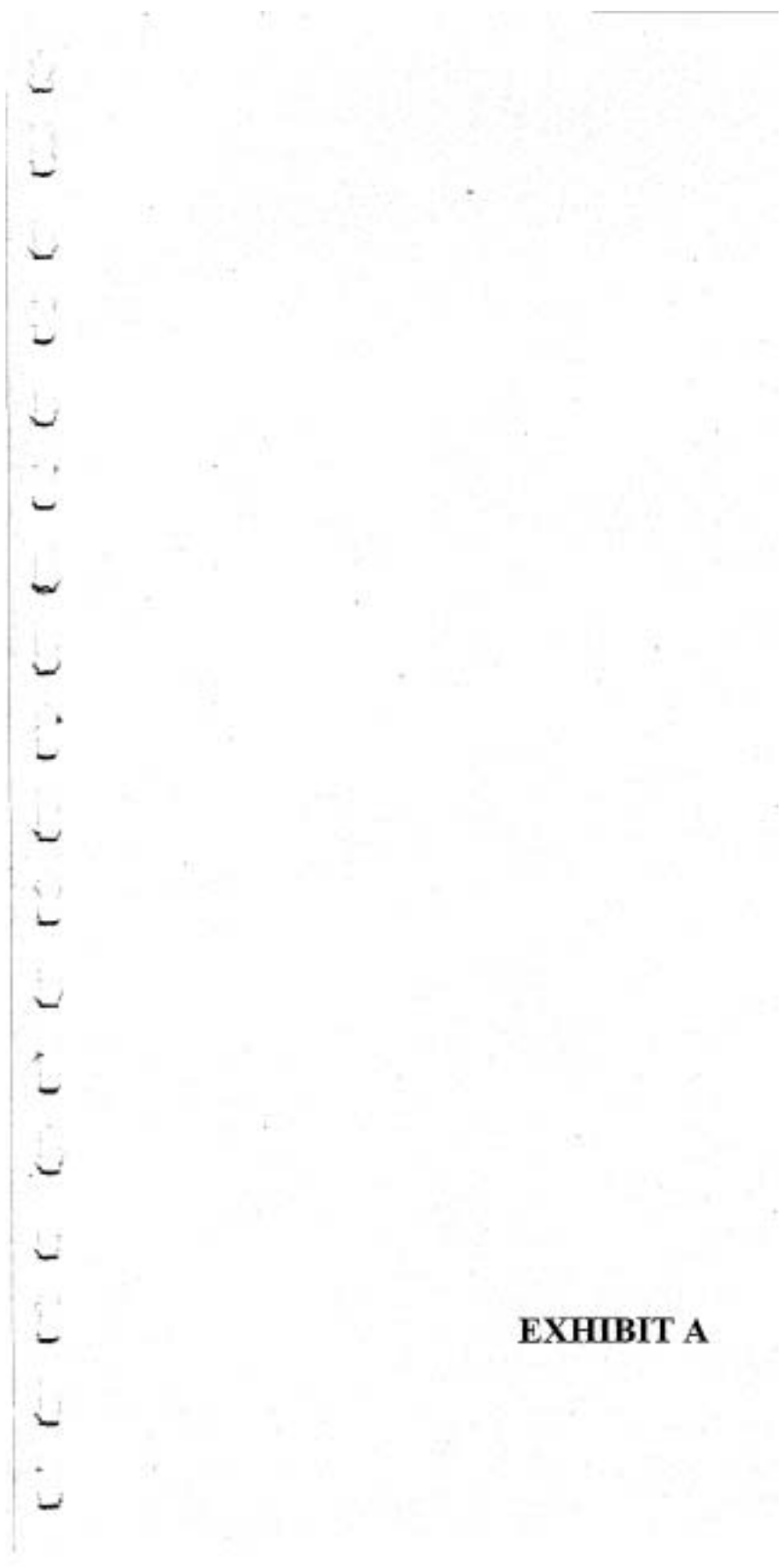


EXHIBIT A

- Create the structure for the design and implementation of the actions.

State and Entitlement jurisdictions should determine whether the structure will be the same as for the AI part of FHP. If not, it should decide which individuals or organization(s) will have primary responsibility.

The jurisdiction should provide guidance to ensure that those responsible have designed actions that include input from all the organizations and individuals it believes should be part of designing the actions.

These steps can occur before the AI is fully completed to expedite development of the fair housing actions.

2.10 STEPS TO TAKE BEFORE DEVELOPING ACTIONS

Objectives

The jurisdiction should define a clear set of objectives with measurable results that it intends to achieve. The sole measure of success for FHP is the achievement of results. These objectives should be directly related to the conclusions and recommendations contained in the AI.

For each objective, the jurisdiction should have a set of goals. These might be the completion of one or more discrete actions, or set of actions, which serve as milestones toward achieving each objective.

Fair Housing Actions

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.

2.11 IMPLEMENTATION OF FAIR HOUSING ACTIONS

In order to bring the hard work of planning and analysis to fruition, it is essential that the jurisdiction implement its fair housing actions. The jurisdiction can more readily achieve effective implementation of the actions, if it has:

- Defined objectives with measurable results
- Designed achievable actions, supported by all key elements in the community and designed to address real fair housing problems
- Assessed its FHP activities on a regular basis to assure consistent oversight of, and interest in, the efforts of all individuals and organizations engaged in fair housing actions.

Government officials should exercise an appropriate level of leadership, as may be required, to resolve conflicts and oversee the implementation of corrective actions, changes, or additions in fair housing actions.

Self-Assessment

FHP should include a process for monitoring the progress in carrying out each action and evaluating its effectiveness. The process should identify:

- The entity conducting the assessment (jurisdiction or third-party contractor)
- The specific assessment activities (e.g., survey, onsite review, telephone interview)
- The standards or criteria to be used to determine the effectiveness/ineffectiveness of an action
- Any additional areas that require study and analysis or surface as a result of implementing the action
- Any recommendations for addressing additional areas.

Changes

FHP should include a process for making "mid-course" corrections, changes, or additions as the planned actions are underway.

The importance of continuing oversight by top grantee officials cannot be overemphasized.



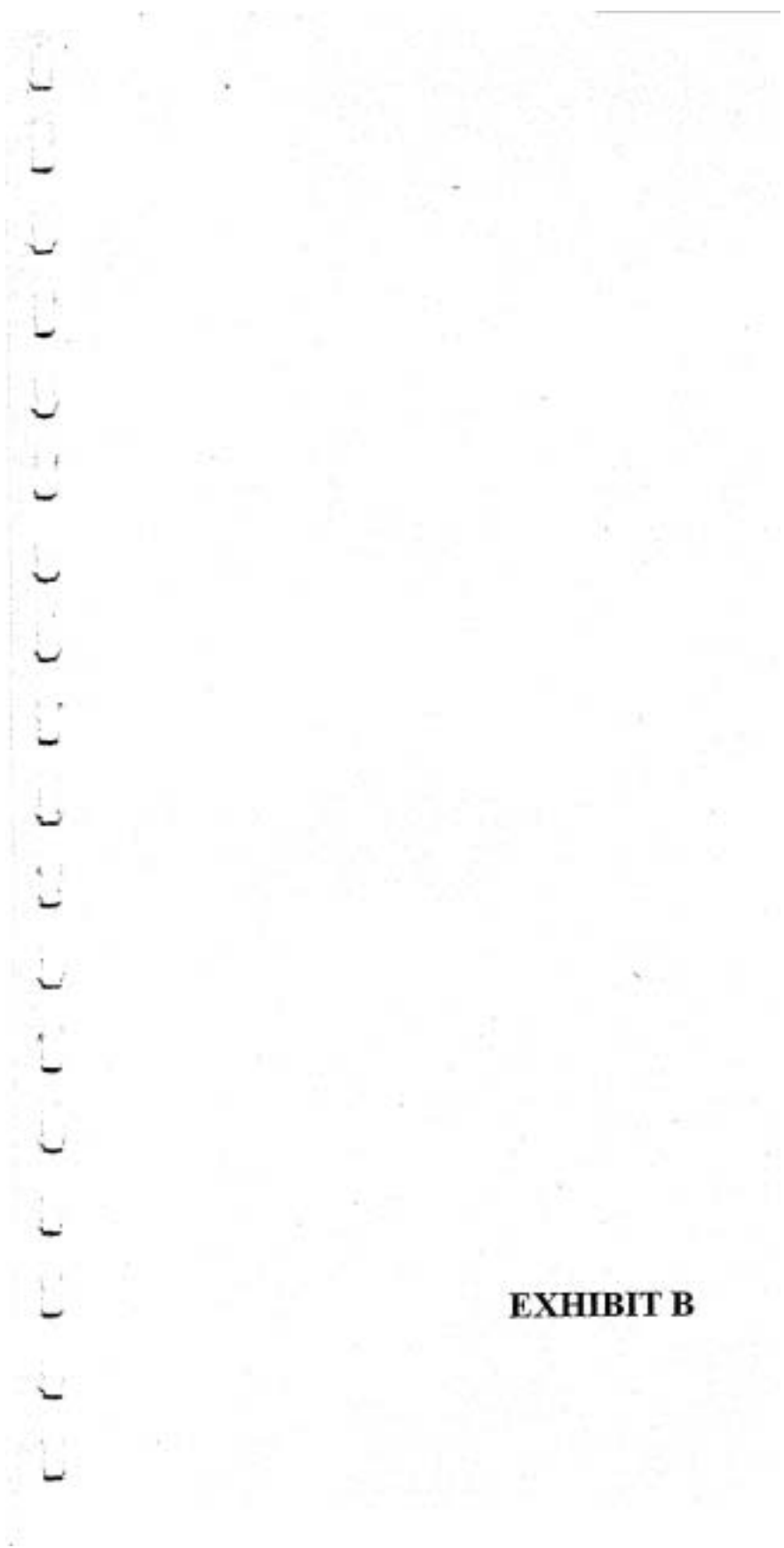
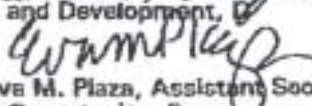


EXHIBIT B

FEB 14 2000

MEMORANDUM FOR: All CPD Field Office Directors
All FHEO Field Office Directors

FROM:  Gerald Coopers, Assistant Secretary for Community Planning
and Development, D


Eva M. Plaza, Assistant Secretary for Fair Housing and Equal
Opportunity, E

SUBJECT: Analysis of Impediments To Fair Housing Choice

This memorandum provides guidance to field offices regarding the requirement that state and local entitlement jurisdictions receiving funding through the Consolidated Plan prepare an Analysis of Impediments (AI) to Fair Housing Choice. This guidance should be communicated to all program participants.

The Consolidated Plan regulation (24 CFR 91) requires each state and local government to submit a certification that it is affirmatively furthering fair housing. This means that it will conduct (1) an analysis of impediments to fair housing choice, (2) take appropriate actions to overcome the effects of impediments identified through that analysis, and (3) maintain records reflecting the analysis and actions.

In response to requests from state and local governments, the Department developed a *Fair Housing Planning Guide* and training program to assist in fair housing planning and in fulfilling the fair housing requirements of the Consolidated Plan and Community Development Block Grant regulations. The Guide provides information on how to conduct an AI, undertake activities to overcome identified impediments, and maintain documentary records. The Guide should be used by state and local governments to conduct or update their AIs.

The Guide defines the AI as a comprehensive review of a state's or entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices. The AI involves an assessment of how these laws, regulations, policies, and procedures affect the location, availability, and accessibility of housing and how conditions, both private and public, affect fair housing choice.

A jurisdiction must include a summary of the impediments identified in the AI plus a description of actions taken to overcome the effects of impediments identified through the analysis in their Consolidated Annual Performance and Evaluation Report. Although AIs are not submitted or approved by HUD, each jurisdiction should maintain its AI and update the AI annually where necessary, and include actions the jurisdiction plans to take to overcome the effects of impediments to fair housing choice during the coming year in the Annual Plans that are submitted as part of the Consolidated Plan submission.

HUD can require the submission of an AI in the event of a complaint or as part of routine monitoring. If, after reviewing all documents and data, HUD concludes that (1) the jurisdiction does not have an AI, (2) an AI was substantially incomplete, (3) no actions were taken, (4) the actions taken were plainly inappropriate to address identified impediments, or (5) the jurisdiction has no records, the Department would provide notice to the jurisdiction that it believes the certification to be inaccurate or, in the case of certifications applicable to the CDBG program, that the certification is not satisfactory to the Secretary. In connection with this review, HUD will consider whether a program participant has made appropriate revisions to update the AI.

HUD will work with the jurisdiction to determine actions necessary to address issues raised concerning compliance with the certification. These actions may take the form of a special assurance which describes actions to overcome the effects of identified impediments and which includes a timetable for accomplishing these actions.

If you have any questions regarding this guidance, please contact Nadab Bynum at (202) 708-2565 x4630 (for CPD) or Pam Walsh at (202) 708-2288 x7017 (for FHEO).

EXHIBIT C

that may have a discriminatory effect play a role in producing the more severe conditions for certain groups.

2.8 COMMUNICATE AI RESULTS

Once the AI is completed, HUD encourages jurisdictions to communicate conclusions and recommendations to top policy makers, key Government staff, community organizations, and the general public. Jurisdictions should:

- Provide a copy to organizations and individuals participating in the AI process and other organizations focusing on housing issues
- Advise the general public by holding meetings or other public forums in accessible meeting facilities with sign language interpreters and other accommodations made available
- Provide a means other than public forums for other citizen participation (e.g. written comments, comment via the electronic media) regarding the conclusions and recommended actions resulting from the AI
- Publicize key aspects of the AI
- Utilize alternative formats (e.g. braille, large type, tapes or readers) for persons with visual impairments
- Have sufficient copies on hand to distribute to the public, upon request
- Brief key officials and staff in the Government as well as community organizations that express an interest.

Obtaining strong and broad-based support for the ensuing fair housing actions is critical to the long-term success of the grantee's efforts to affirmatively further fair housing.

COMPONENT 2: TAKING ACTIONS TO ELIMINATE IDENTIFIED IMPEDIMENTS

2.9 INTRODUCTION

Before developing actions to eliminate the effects of any impediments identified through the AI (fair housing actions), the jurisdiction should:

- Ensure that diverse groups in the community are provided a real opportunity to take part in the developmental process



EXHIBIT D

Chapter 4:

Fair Housing Planning Requirements and Guidelines for Entitlement Jurisdictions

4.1 ENTITLEMENT REQUIREMENTS

The Consolidated Plan's certification to affirmatively further fair housing (AFFH) requires Entitlement jurisdictions to undertake Fair Housing Planning (FHP). Since FHP is a component of the Consolidated Plan, the citizen participation requirement for the Consolidated Plan applies (24 CFR 91). FHP consists of the following:

NOTE: *Since FHP and the Consolidated Plan are on a different time schedule for the first cycle, HUD does not expect the jurisdiction to follow the strict citizen participation requirements for their first Analysis of Impediments to Fair Housing Choice (AI). However, HUD does expect the jurisdiction to develop an AI that involves and addresses concerns of the entire community.*

1. Conducting an AI.

Suggests that Entitlement jurisdictions conduct their AI at the beginning of each Consolidated Plan cycle.

2. Taking appropriate actions to overcome the effects of any impediments identified through the AI.

HUD suggests that actions to address any identified impediments should have measurable results. Additionally, before taking such actions, HUD suggests that jurisdictions establish a prioritized list of impediments to address. The list should contain specific milestones and timetables.

3. Maintaining the following records:

- Documentation of the AI
- Actions taken in this regard.



EXHIBIT E



U.S. Department of Housing and Urban Development
Los Angeles Area Office, Pacific/Hawaii Area
611 West 6th Street
Los Angeles, California 90017

COPY

February 24, 1997

Mr. James C. Hankla
City Manager
ATTENTION: Mr. Craig Beck
City of Long Beach
333 West Ocean Blvd.
Long Beach, CA 90802

Dear Mr. Hankla:

SUBJECT: Consolidated Submission/Plan
On-site Monitoring

On November 12 and 13, 1996, Ms. Ana L. Madrigal, Equal Opportunity Specialist, conducted an on-site Fair Housing and Equal Opportunity monitoring review of the Consolidated Submission/Plan that is implemented and administered by the City of Long Beach.

The review was conducted under the authority of Title VI of the Civil Rights Act of 1964, the Fair Housing Act of 1968, as amended, Section 109 and Section 104(b)(2) of the Housing and Community Development Act of 1974, as amended, and applicable HUD Regulations. The objective of the monitoring review was to determine whether the City of Long Beach's performance conforms with applicable fair housing and equal opportunity requirements, as they impact on persons protected by the Civil Rights Laws and Executive Orders. The review took into account the cumulative programs' funding.

Summary

Our monitoring concluded with no negative findings, as such. However, we do have two resulting concerns relating to (1) requirements to complete an Analysis of Impediments (AI) to fair housing choice and (2) the requirement to implement an employment and business effort under Section 3 of the Housing and Community Development Act of 1968, as amended.

I. Affirmatively Furthering Fair Housing

The Fair Housing Act, Section 104(b)(2) of the Housing and Community Development Act of 1974, as amended, and 24 CFR 570.601 require that the grantee assume the responsibility of fair housing planning by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified

through that analysis, and maintaining records reflecting the analysis and actions in this regard.

The City of Long Beach contracts with the Long Beach Fair Housing Foundation (FHF) to provide fair housing services to the City's residents.

From July 1, 1995 to June 30, 1996, FHF provided services to 8,409 individuals and families. Based on the statistics shown, out of this number 30% were Latino, 36% African American, 29% were Caucasian, 2% were Asian/Pacific Islanders, less than 1% were American Indian. In addition, 54% of this number were identified as female heads of household.

According to records provided, in 1995/1996, the FHF received over 1000 inquiries, many of which resulted in fair housing complaints. FHF appears to have conducted 305 investigations. Based on the records reviewed the majority of the complaints filed were race based. In the City of Long Beach there were 99 cases, out of which 40 were race based. A review of the intake procedure, investigations, evaluations and resolutions was conducted. Additionally, copies of actual complaints were reviewed.

In 1995 and 1996, records show that legal information on Fair Housing was provided at workshops conducted by FHF in the City of Long Beach for over 1500 persons. Within the same year over 5600 pieces of informational literature were apparently distributed in the City of Long Beach. Literature distributed included English, Spanish and Khmer. FHF conducted ten Fair Housing Workshops in the City of Long Beach and staffed three Fair Housing booths at various events. The above information was verified through interviews, files and other documentation provided by the City and FHF staff. Based on all the documentation it was apparent that the City, through its contract agent, FHF, had carried out activities intended to affirmatively further fair housing.

Analysis of Impediments to Fair Housing Choice (AI)

The City's AI was completed on February 6, 1996. A copy of the City's AI was provided during our monitoring review. Our review of the City's AI has resulted in the following comments:

- (1) Generally, we find that the completed AI does not include many of the areas that ought to be analyzed and was not conducted in a manner called for in the Fair Housing Planning Guide that was provided to the

City at training workshops and through general mailings from HUD's Headquarters in Washington.

- (2) There appears to have been little or no corroboration during the completion of the AI with community organizations, other housing providers, realtors, lenders, etc. as called for in HUD's Fair Housing Planning Guide.
- (3) Other issues, matters and local practices which the Planning Guide indicated for inclusion, but omitted in the Long Beach AI, were the following:
 - + A discussion of the methodology used in preparing the AI.
 - + Certain data sources, such as educational data and mapping software.
 - + The use of accessibility standards in local construction.
 - + Policies concerning the application of site and neighborhood standards for local new construction developments, especially for assisted developments.
 - + Policies and practices that connect transportation and social services with housing opportunities.
 - + Whether government services are provided equally through all neighborhoods.
 - + Policies and practices of your public housing agencies.
 - + "All adult" issues, deed restrictions, inaccessible designs, local occupancy standards and practices, local lending practices, real estate appraisal practices, insurance underwriting practices, and segregated housing conditions locally.
- (4) The City's AI concluding list of impediments include general social and economic problems and conditions which do not relate to fair housing choice; as such, problems not dealing with race, color or other personal characteristics covered by fair housing laws or not related to housing discrimination. The analysis is focused outside of the provided fair housing guidance, on problems of affordability instead of problems related to housing discrimination, direct or indirect. Thus the actions proposed, for the most

part, are not fair housing or viewed as intended to further fair housing.

We recommend that the City of Long Beach revisit this process during the coming months in order to improve significantly those parts of your AI that are not in keeping with our Fair Housing Guide. We are including a Self-Review Form for your use to help in this process. We will be happy to provide further assistance and an additional copy of the Fair Housing Guide, if you desire such. We would appreciate a response to this concern within 60 days of receiving this letter.

II. Equal Benefits Opportunities

Section 24 CFR 570.602 of the CDBG regulations, Title VI of the 1964 Civil Rights Act, and Section 109 of the Housing and Community Development Act of 1974, as amended, prohibit discrimination on the basis of race, color, national origin or gender in the use of CDBG funds and indicate appropriate affirmative action to be undertaken in order to ensure that the program or activity is open to all without regard to race, color, or national origin.

Among the CDBG funded projects is one that provides residents with various self-help programs to improve their homes. After meeting certain income guidelines and once approved, homeowners can participate in the various programs. The Home Improvement Rebate Program (HIRP) and the Homeowner-occupant Rehabilitation Loan Program together provided 765 loans to Long Beach residents. Out of this number, 89% were minority residents and 43% were female heads of household.

Interviews concerning the City's Rehabilitation Program were conducted with various City representatives, and a review of several files and documents was conducted in order to verify information on the way the program operates and regarding beneficiaries.

An interview was also conducted with the person overseeing the Graffiti Prevention Mural Program. According to the representative, an average of 25 to 50 residents, between the ages of 14 and 25 years old, attend annually. Well known local artists volunteer their time and skills to teach residents participating in the program. For the 1995/1996 fiscal year, 41 Census tracts were included. Records showed that 32 out of the 41 Census tracts involved in the program had over 50% minority residents (an average of 80% on the majority of these census tracts). The other nine were below 50%, including :

census tract with 0% minority residents. Eight murals were completed and \$87,557 was spent for fiscal year 1995/1996. Some of these sites were visited in order to verify the information as reported.

Based on the information, records and interviews provided, it seems that the City of Long Beach is doing well in terms of providing equal benefits opportunities in the above mentioned programs.

III. Section 3 Program

According to 24 CFR Part 135 of the federal regulations for Section 3 of the Housing and Urban Development Act of 1968, as amended, whenever HUD financial assistance is provided at \$200,000 or more for housing or community development construction projects, to the greatest extent feasible, economic opportunities will be given to low-income residents and businesses in those areas where the construction takes place.

While on-site, interviews were conducted with the various city employees involved in Section 3, including the person responsible for overseeing the program. Apparently, a mechanism to collect the data was not in place. However, the City Representative was in the process of developing a mechanism. Based on the records reviewed, the proper City Staff has been trained or attended the 1995 workshop sessions provided by this office. Records also show that in qualified Section 3 City contracts, all necessary language is included. Section 3 is also properly addressed apparently during the bidding process.

Furthermore, prior to the monitoring review, there was a written exchange of information between the City and this office. The exchange was in reference to a specific Section 3 qualified construction project currently being developed in the City. During this exchange, it was clearly stated that all necessary measures are being taken in order to ensure that Section 3 requirements are met. On December 2, 1996, this exchange was followed up with a telephone conversation in which, again, compliance with Section 3 regulations was assured.

At the time of the monitoring, the Section 3 Report for fiscal year 1995/1996, had not been submitted by the City. Thus, we recommend that this report be sent to this office as soon as possible in order to clear our concern in reference to Section 3. Enclosed find the Section 3 "Technical Assistance Team Report", which I promised to make available to City during our December 2, 1996,

telephone conversation.

IV. Minorities/Women Business Enterprise MBE/WBE

According to 24 CFR 85.36, recipients have an obligation to take reasonable actions to maximize opportunities for minority and women contractor participation in the CDBG program.

Based on the City's Contract and Sub-contract Activity Report, minority business owners received 28% of the total (approximately \$3,209,780) program monies spent during fiscal year 1995/1996. Women owned business (WBE) participation was 15% (approximately \$500,000) of the total amount spent for same fiscal year. Two of the WBE owners were interviewed during the monitoring and one of the sites was visited. During the interviews both women gave detail accounts of their participation in the WBE program. These details appeared to coincide with the recorded information.

An interview was also conducted with a City Representative currently overseeing the City's Business Development Center. Their most successful program, according to the City Representative, is their annual Minority-Owned and Women-Owned Business Development Conference.

Based on the above information, it is apparent that the City is currently meeting their MBE/WBE requirements as stated on the regulations.

V. Section 504 Regulations

Section 504 of the Rehabilitation Act of 1973, as amended, states in pertinent part that "no otherwise qualified individual with handicaps in the United States...shall, solely by reason of his/her handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The City of Long Beach used an outside consultant to conduct their assessment and transitional plan. The transitional plan was completed on September 1, 1995. A copy of the assessment and plan were available and reviewed during the monitoring. Among the City's first projects were the public library and the Council Chambers. A list of their improvements schedule, showed that out of about 30 proposed projects, about 50% have been completed. Based on these records, it appears that the City completed their assessment and transitional plan as required by the

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regulations.

We appreciate the time, courtesy and cooperation provided by Mr. Craig Beck and other staff members during the monitoring review. Should you have any questions or require additional information please contact this office at (213) 8948040.

Very sincerely yours,

Thomas F. Honore
for Thomas F. Honore
Director
Civil Rights Division

Enclosure

EXHIBIT F

metropolitan area-wide housing assistance, marketing, information, counseling, and referral center.

- Discourage discrimination in all programs by encouraging all persons regardless of race, color, religion, sex, disability, familial status, or national origin to consider all housing options.

Metrowide/regional FHP includes an analysis that identifies both State and Entitlement jurisdictional and regional impediments to fair housing choice and the appropriate actions to remove them.

A key aspect of metrowide/regional FHP is the creation of a centralized and consolidated applicant database for all assisted housing programs operating in the metropolitan/regional area which can be metro regionally administered.

Establish Workable Procedures

State and Entitlement jurisdictions should have workable procedures that:

- Accommodate diverse views and interests
- Provide for input from persons who have only a limited time to meet, deliberate, review written materials, and any other necessary functions
- Provide for convenient, accessible meeting places and times
- Provide for conflict resolution and decisionmaking in the event the initial conflicts can not be resolved.

Build Relationships and Communication

The AI structure should provide for effective, ongoing relationships with *all* elements of the community with clear and continuous exchange of concerns, ideas, analysis, and evaluation of results. Involvement by the chief executive is necessary whether the State or Entitlement jurisdiction is conducting the AI on its own or is participating with other jurisdictions in a metrowide/regional AI.

This linkage with the chief executive is important because it is the chief executive that has the ultimate responsibility for the State or Entitlement jurisdiction's FHP. This official should ensure, through focus groups, an advisory commission, town meetings, or other effective means, that regular contact and working arrangements are created and maintained with:

EXHIBIT G

- *Fair Housing Organizations*

Fair housing organizations, including human relations commissions and voluntary, nonprofit organizations focusing on fair housing problems

- *Other Governments*

Other governments in the metropolitan area or region (even if the jurisdiction is not participating in metropolitan or regionwide FHP)

- *Advocacy Groups*

Advocacy groups and organizations that have among their concerns the needs (including housing needs) of particular segments of the population, such as people with disabilities; families with children; immigrants and homeless persons; and specific racial or ethnic groups (Blacks, Hispanics, Native Americans, Asian Americans, Alaskan Natives)

- *Housing Providers*

Housing provider representatives, in particular those who are aware of, and can speak to, the problems of providing moderate- and low-cost housing in the community; and representatives of landlords/owners

- *Banks and Other Financial Institutions*

Banks and other financial institutions that can provide loans (including residential) and other financial support to improve homes or areas of the community where living conditions have deteriorated

- *Educational Institutions*

Educational institutions and their representatives, including the administrators and teachers/professors who can assist in conducting studies and developing educational activities for delivery in formal and informal settings

- *Other Organizations*

Other organizations and individuals, such as neighborhood organizations and representatives, that can provide information, ideas, or support in identifying impediments to fair housing choice at the neighborhood or other geographic level and in developing and implementing actions to address these problems



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Writer's Direct Dial Number (213) 640-3897
Writer's Email Address: sbrowne@lafla.org

September 15, 2003

Community Development Advisory Commission
City of Long Beach

**RE: COMMENTS RE: AUGUST 2003 REVISIONS TO THE CITY OF LONG
BEACH'S 2001 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING
CHOICE**

Dear Commissioners:

The Legal Aid Foundation of Los Angeles and Mental Health Advocacy Services, Inc., filed a complaint with HUD on March 7, 2002 challenging the sufficiency of the City of Long Beach's 2001 Analysis of Impediments to Fair Housing (AI). On February 7, 2003, HUD issued a decision letter instructing the City to make a number of revisions to its AI based upon our complaint. While Legal Aid appreciates the City's efforts to revise its 2001 AI to bring it into compliance with HUD's decision, the City's AI is still deficient in a number of ways. Pursuant to HUD's decision letter, the City should make the following revisions to the AI:

1. The Citizen Participation Requirements of the Consolidated Plan Apply to the AI Process

In its February 7, 2003 decision letter, HUD clearly stated that the citizen participation requirements of the Consolidated Plan apply to the AI. HUD's decision letter provides, "since the AI is considered to be a component of the Consolidated Plan, the citizen participation requirement for the Consolidated Plan also applies (24 CFR 570.431). Therefore, jurisdictions are expected to follow the citizen participation requirements for its AI and are expected to develop an AI that addresses the concerns of the entire community." (See Feb. 7, 2003 HUD letter, p.2).

Despite this clear mandate from HUD, the City's AI continues to provide that the citizen participation requirements of the Consolidated Plan do not apply to the AI process. The AI, at page 11, provides:

As a component of the Consolidated Plan, citizen participation is a required element of the Analysis of Impediments study. However, in that many jurisdictions complete the AI study separate and apart from the Consolidated Plan, HUD does not expect jurisdictions to follow the same strict citizen participation requirements with the AI study.

This statement willfully misrepresents HUD's mandate. The City must revise its AI to accurately reflect HUD's mandate that the citizen participation requirements of the Consolidated Plan apply to the AI. It is particularly disturbing that the City has left this misrepresentation in the AI despite such clear direction from HUD.

The citizen participation requirements of the Consolidated Plan process (24 CFR 91) provide, in short, that a jurisdiction must: (1) consult with public and private agencies; (2) adopt a citizen participation plan; (3) encourage citizen participation; (4) provide citizens a comment period of at least 30 days; (5) accept comments orally and in writing; and (6) consider comments in preparing a final draft.

Because the City has alleged that it does not have to comply with these citizen participation requirements, it is safe to assume that the City has, in fact, not done so. At a minimum, it is clear that the City has failed to consult with public and private agencies, adopt a citizen participation plan and encourage citizen participation. The only outreach the City engaged in with this latest draft of the AI was to mail copies of the AI to community based organizations, whose names were provided by Legal Aid. The City took no efforts to explain what the AI is or to gather meaningful input from these community based organizations.

II. Lead Based Paint

In our complaint to HUD regarding the City's 2001 AI, we alleged that the City's AI was deficient because it failed to provide a sufficient analysis of lead based paint. Legal Aid is pleased that the City included more information regarding lead in this latest draft of the AI. We are also pleased that the City now recognizes lead based paint as an impediment to fair housing. In prior AIs, the City continuously alleged that lead based paint was not an impediment to fair housing, despite evidence to the contrary and objections from Legal Aid.

Unfortunately, however, the AI still falls short in its analysis of lead because it fails to set forth how the City intends to overcome the effects of lead based paint since it is an impediment to fair housing. In its February 7, 2003 decision letter, HUD instructed the City that "an acceptable AI normally contains definitive goals, strategies, time frames, and actions coupled with definitive dates to accomplish the task designed to address, reduce and/or eliminate the impediments identified." (See HUD Feb. 7, 2003 letter, p. 3). The City's AI does not set forth any definitive goals, strategies, time frames or actions to overcome the effects of lead based paint. The comments submitted by Kathleen Over, Legal Aid's lead outreach worker, provide suggested goals and strategies to overcome the

effects of lead based paint. The AI's Summary of Impediments and Accomplishments, moreover, fails to include a discussion lead based paint (See AI p. 106-115). The AI must be revised to include this information.

III. Prohibition of Social Services on Anaheim Street

HUD instructed the City, in its February 7, 2003 decision letter to review and analyze the Anaheim Street Moratorium as an impediment to fair housing (See HUD Feb. 7, 2003 letter, p.3). The Anaheim Street Moratorium (Ordinance No. C-7751) prohibited social services, along with gun and alcohol sales, on a significant portion of Anaheim Street in the City of Long Beach. The Moratorium had fair housing implications because the location of social services impacts where low-income persons, and persons of color, live. Since the time of our complaint, the Moratorium has been replaced with a permanent zoning change on Anaheim Street. This permanent zoning change similarly prohibits social service agencies with food and only allows social service agencies without food with an administrative use permit. The City's latest draft of the AI should include an analysis of the effects of the permanent zoning change on Anaheim Street. Unfortunately, the City has failed to include such an analysis in the AI, despite HUD's instructions to do so. The AI must be revised to include this information.

IV. The Matrix is Incomplete

In its February 7, 2003 decision letter, HUD instructed the City to complete the Summary of Analysis of Impediments and Accomplishments Matrix (See HUD Feb. 7, 2003 letter, p. 4). The Matrix is a critical component of fair housing planning, as jurisdictions use the Matrix to commit to specific actions and time frames to overcome the effects of identified impediments. HUD explained in its February 7, 2003 decision letter that, "an acceptable AI normally contains definitive goals, strategies, time frames, and actions coupled with definitive dates to accomplish the task designed to address, reduce and/or eliminate the impediments identified." (See HUD Feb. 7, 2003 letter, p. 3). Unfortunately, however, the City's Matrix is vague and incomplete (See AI at p. 106-115). The Matrix also illustrates that the City has failed to allocate money to remedy many of the impediments identified. The City must complete the Matrix and allocate funds to overcome the effects of impediments to fair housing in the City.

V. The AI does not Include an Analysis of the Items delineated in HUD's 1997 Letter to the City

On February 24, 1997, HUD sent a letter to the City explaining it had found a number of deficiencies with the City's 1996 AI. HUD made recommendations regarding how those deficiencies should be remedied. The City informed HUD that it would address these deficiencies in future updates of the AI. Unfortunately, however, many of these same deficiencies remain in the current draft of the AI. In its February 7, 2003 decision letter, HUD instructed the City to "provide us with a status report on the recommendations delineated in our [February 24, 1997] letter." (See HUD Feb. 7, 2003 letter, p. 4). Despite this direction from HUD, the City's AI still fails to address many of

those deficiencies. In particular, the AI fails to discuss: the policies and practices that connect transportation and social services with housing opportunities, whether government services are provided equally throughout all neighborhoods, and the policies and practices of local public housing agencies. Although the City has added a brief section to the AI regarding the Housing Authority of the City of Long Beach and the Housing Authority of the County of LA (See AI at p. 99-100), the discussion is meaningless, as it fails to make any conclusions as to whether the policies and practices of either of these public housing agencies constitutes an impediment to fair housing. The AI must be revised to include a meaningful analysis of the policies and practices of these housing authorities.

Thank you for consideration of our comments. Should you wish to contact me, I can be reached at (213) 640-3897.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susanne Browne', written over the typed name.

Susanne Browne
Staff Attorney

CC: Eula Williams
Jerry Miller
Melanie Fallon
Dennis Thys
BJ Wills
Barbara Shull
Don Smith
Anita McCarty



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802

October 7, 2003

Susanne Browne
Staff Attorney
Legal Aid Foundation of Los Angeles
110 Pine Avenue, suite 420
Long Beach, California 90802-4421

SUBJECT: August 2003 Revisions to the City of Long Beach 2001 Analysis of Impediments (AI) to Fair Housing Choice

Dear Ms. Browne:

The City of Long Beach has received your letter of September 15, 2003 in regards to the recent revision of the 2001 Analysis of Impediments to Fair Housing Choice. Although the United States Department of Housing and Urban Development accepted the AI in a letter dated July 10, 2003, the City is making an effort to work in partnership with Legal Aid. We appreciate the ability to respond and provide clarity to these issues.

A. Citizen Participation Requirements of the Consolidated Plan Apply to the AI Process.

The City of Long Beach, working in conjunction with the Fair Housing Foundation (FHF) and the Institute for Urban Research and Development (IURD), who were awarded the contract to create the 2001 AI, aggressively conducted outreach for public participation. Notices in local newspapers, including Spanish and Khmer, mailing flyers throughout the community, posting the AI on the City's website and including a draft copy of the AI at the Main Library and the Neighborhood Resource Center were some of the efforts that the City of Long Beach made in an earnest effort to reach the public. At your request, we also mailed copies of the draft AI to 23 agencies for their comment. The City had a period of over thirty days for public comment. All the testimony from the September 17th Public Hearing will be included in the AI. In addition, the City is including all written responses received at the Public Hearing as well as the City's responses.

B. Lead Based Paint

The City has revised the AI to include an analysis of lead based paint as an impediment to fair housing choice. Based on the lead based paint analysis now included in the AI, we have concluded that the effects of lead-based paint is not an impediment to fair housing choice because of membership in a protected class. The City of Long Beach recognizes that due to the age of our housing stock throughout the City, lead based paint is an issue that affects all households. The data provided shows that lead based paint is present throughout the City.

The City has programs to reduce the prevalence of lead present in homes. All City funded rehabilitation programs must practice "Lead – Safe" measures and be tested for lead before the project is completed. The Department of Health and Human Services is implementing a Lead Based Paint Removal Program in low-income neighborhoods, especially those with young children.

C. Prohibition of Social Services on Anaheim Street

The City of Long Beach has identified the issue of zoning limitations for nonprofit service providers and the Community Development Advisory Commission, (CDAC), has written a letter to the Planning Commission to highlight zoning issues and requesting that they take "the appropriate actions necessary to address these potential barriers to fair housing choice."

D. The Matrix is Incomplete

The City of Long Beach has completed the Summary of Analysis of Impediments and Accomplishments Matrix which is included in the revised AI. The City of Long Beach has submitted this Matrix to HUD and it has been found acceptable. The City has identified a plan and an action to reduce and/or eliminate impediments identified and has contracted with Fair Housing Foundation to achieve those goals. The Matrix also includes additional funding to cover specified actions.

E. The AI does not include an Analysis of the Items Delineated in HUD's 1997 Letter to the City.

In the letter dated February 24, 1997 from the United States Department of Housing and Urban Development (HUD), there were no negative findings. HUD did make several recommendations. The City, working with Fair Housing Foundation and IURD, carefully reviewed the HUD recommendations. In fact, the City chose to undertake a new AI, rather than just update it, as was required. Further, City staff and staff from the Fair Housing Foundation met with Mr. Dennis Rockway, of your staff, to discuss the issues identified in the HUD letter. The information from that meeting, very early in the AI development process, helped to frame the document.

The current AI includes an extensive list of specific concerns, issues, and practices that may serve as impediments to fair housing choice in the City of Long Beach, along with specific actions to overcome the effects of existing impediments to fair housing choice in Long Beach.

The City of Long Beach believes that the AI is a "living" document. We are willing to amend the AI to make it a complete document. The City of Long Beach has created a comprehensive document that we believe accurately identifies impediments to fair housing choice in Long Beach. The City of Long Beach will continue working and revising the AI as changes arise to document the barriers to fair housing that must be overcome. We are proud of our partnership with the Fair Housing Foundation of Long Beach to address the housing discrimination issues. We are confident that our work in furthering fair housing choice through multilingual education and outreach.

Sincerely,



BJ Willis
Development Project Manager
Neighborhood Services Bureau

LONG BEACH AREA COALITION FOR THE HOMELESS

P.O. Box 92365

Long Beach, California 90809-2365

President: Arlene Mercer, (562) 598-3003

September 17, 2003

City of Long Beach
Community Development Advisory Commission
City Hall - Council Chambers
333 West Ocean Boulevard
Long Beach, California 90802

Re: City of Long Beach Analysis of Impediments to Fair Housing Choice dated August 2003

Dear Commissioners:

First, the Long Beach Area Coalition for the Homeless adds a strong second to the Proposed Actions regarding Zoning on pages 88 through 92 of the August 2003 Analysis of Impediments to Fair Housing Choice, as follows:

1) **Social Service Office (without food distribution).** "The use classification of Social Service Office (without food distribution) and the use classification Professional Services should be identical," so that such social service offices would no longer be required to apply for a Conditional Use Permit.

This change should revisit the recently rezoned Anaheim Corridor, which is within walking distance, and on a bus line as well, from the Multi-Service Center serving the homeless population at 1301 W. Twelfth Street, Long Beach.

2) **Emergency Shelter.** "The Zoning Code should be amended to include a definition of emergency shelter and be incorporated as a use classification and treated similar to other use classifications with similar characteristics," and "defined so as to be consistent with HUD's definition that includes the idea that emergency shelter provides overnight shelter and fulfills residents' basic needs (i.e., food, clothing, medical care), either on-site or through off-site services."

Please Note: Included in your definition of this use classification is a seven-day time limit. We believe residence in Emergency Shelters needs to be permitted for periods longer than seven days, particularly for formerly homeless individuals and families who need longer than a week to access the services necessary and to obtain employment and/or treatment required for them to obtain either transitional or permanent housing.

3) **Transitional Housing.** "The Zoning Code should be amended to include a definition of transitional housing and be incorporated as a use classification and treated identically to similar single-family residential and multi-family residential uses.

The addition to this use classification of Single-Room-Occupancy dwellings, particularly in light of the scarcity of housing in Long Beach for very low income people. Homeless people need accessible low-rent places to live when they leave Emergency or Transitional Housing.

The Long Beach Area Coalition for the Homeless strongly believes that the zoning changes you recommend, as noted above, will provide greatly needed improvement to the access of homeless individuals and families to services and fair housing choices. These choices are not yet available in sufficient quantity in the City of Long Beach, due largely to the impediments you have noted in the current zoning ordinances. Zoning changes to allow many more Emergency Shelter beds, Transitional Housing facilities, Single-Room Occupancy housing, and Social Service Offices throughout the City are essential to alleviating the lack of access to housing of this portion of our City's citizens, many of whom are employed in low-wage jobs.

Your attention is directed to the large portion (5,845, which is 1.27 percent) of the total Long Beach population of 461,522 (per 2000 Census) that is homeless. It is vital that you recognize the ways in which the condition of homelessness amplifies the effects of all of the categories of impediments and protected classes covered in your Analysis. We again ask you to give serious consideration to the essential benefit this 1.27 percent of the Long Beach population would receive from the changes in zoning you recommend and from additional housing affordable by those earning minimum wage.

In addition, there is the further fact that the representation in this population of various racial/ethnic groups differs significantly from the racial/ethnic composition of the total Long Beach population. The following are the percentages by race among the 5,845 homeless individuals in Long Beach counted on March 13, 2003 for the City by The Institute for Urban Research and Development (IURD)—and funded by CDBG monies—compared with the general population according to 2000 Census percentages given on the City's website as nearly as we could compare the different racial/ethnic terms used by the two sources of information:

September 17, 2003
Long Beach Area Coalition for the Homeless to
Community Development Advisory Commission

Page 3

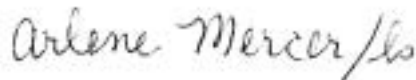
	Homeless	2000 Census Totals
African American	45.7%	14.87%
Caucasian American/White	29.4%	45.16%
Hispanic American/Latino	15.9%	35.77%
Asian American	3.2%	12.05%
American/Alaskan Indian	2.5%	0.84%
Hawaiian/Pacific Islander		1.21%
Other	3.3%	3.0 %

Other HUD-identified protected classes are also present among the homeless population, e.g., seniors, disabled (mentally and physically), and single female heads of households.

We miss from your August 2003 Analysis the specific steps you would take to implement your recommendations and a timeline for accomplishing these. We expect action on and accomplishment of your recommendations within the next year at the latest.

Respectfully,

LONG BEACH AREA COALITION FOR THE HOMELESS



Arlene Mercer
President

cc: Dennis Thys - Neighborhood Services Bureau Manager
B. J. Wills - Development Project Manager



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802

October 8, 2003

Ms. Arlene Mercer
President
Long Beach Area Coalition for the Homeless
P.O. Box 92365
Long Beach, California 90809-2365

Dear Ms. Mercer:

I wish to thank you for your participation and attendance at the September 17, 2003 Public Hearing on the Analysis of Impediments to Fair Housing Choice, (AI). The City of Long Beach greatly appreciates your views and considers them when proposing to improve the quality of life for all residents.

Your comments regarding zoning impediments identified in the AI covered in the Land Use and Zoning Section under the Social Service Office issue. The Community Development Advisory Commission has written a letter to the Planning Commission to highlight zoning issues and requesting that they take the appropriate actions necessary to address these potential barriers to fair housing choice.

Your attendance and comments are always appreciated. Your comments will be considered as try to strengthen the AI in future revisions.

Sincerely,

BJ Wills
Development Project Manager
Neighborhood Services Bureau



Mental Health Association in Los Angeles County

*An affiliate of the
National Mental Health Association,
ranked by Money Magazine as one
of the nation's top health charities*

— November 2000

Accounting Department • 320 Pine Ave., #308 • Long Beach, CA 90802 • 562-285-1330 • Fax: 562-285-1334
Mailing Address: P.O. Box 21052 • Long Beach, CA 90801

September 17, 2003

Community Development Commission
333 W Ocean Blvd.
Long Beach, CA 90802

Re: Amendments to the City's "Analysis of Impediments to Fair Housing"

Dear Commissioners:

Enclosed is a reply to your request that I restate comments made at Wednesday's hearing on amendments to the city's "Analysis of Impediments to Fair Housing."

I brought to your attention a significant impediment not mentioned in the draft document: the difficulty in siting social service programs for people with mental illness in the City of Long Beach. Support services must be available in neighborhoods if people with disabilities are to live independently. The critical relationship between support services and housing opportunities for people with disabilities is established in legislation (ADA Title II), legal opinion (*Olmstead v. L.C.*, 527 U.S. 581 (1999), the "Olmstead decision") and Presidential Executive Order ("Community-based Alternatives for Individuals with Disabilities"). While the draft document identifies program siting issues in the zoning code, the document fails to identify issues related to funding and local political processes. (Funding and political issues fall under the purview of the "A.I." HUD requires the document address "all" impediments to fair housing).

Mental health funding is, by-and-large, administered through the County Department of Mental Health. The Los Angeles County Board of Supervisors requires the approval of service sites by the local supervisor. The local supervisor, in turn, requires a sign off by the local city council member. The local city council members require, in-turn, conversations with, and support from, neighborhood associations. Approval conversations can take months making lease or purchase negotiations difficult or impossible. Also, it has been our experience that the neighborhood associations invariably take the position that new mental health programs would best be placed in some other neighborhood. This multi-level and lengthy process effectively prohibits the siting of new mental health service programs.

Five times, in the past three years, the Mental Health Association in Los Angeles County (MHA) has been unable to use appropriately zoned sites within the city boundaries either because of failure to receive political approval or potential sellers/landlords have refused to wait for the lengthy process to play out. All of these proposed sites were to be used for

MHA Programs:
MHA Village Integrated Service Agency
Antelope Valley Services
Homeless Assistance Programs

Advocacy
Training and Consultation
Human Services Academy
Public Information and Assistance

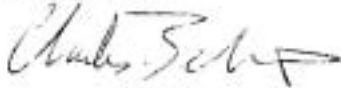
A United Way Agency
Project Return: The Next Step
Clifford Beers Housing Corporation
Planned Lifetime Assistance Network

support services for people with mental illness. MHA has not been able to open any new community-based programs since the County began to enforce its sign-off policy in 2000.

We have the following recommendations:

- The Commission should become familiar with, and the report should reference, the Olmstead Decision.
- Within a year, the Community Development Commission should hold a hearing, inviting County and City political office holders, disability service agencies, and neighborhood associations in order to publicly identify the social service program siting issues as fair housing issues, and to explore how the siting of support service programs might be expedited.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Charles Belknap", with a stylized flourish at the end.

Charles Belknap
Director of Housing
Mental Health Association
in Los Angeles County



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802

October 7, 2003

Mr. Charles Belknap
Director of Housing
Mental Health Association in Los Angeles County
Post Office Box 21052
Long Beach, California 90801

Dear Mr. Belknap:

I wish to thank you for your participation and attendance at the September 17, 2003 Public Hearing on the Analysis of Impediments to Fair Housing Choice. The City of Long Beach greatly appreciates your views and considers them when proposing to improve the quality of life for all residents.

Your agency is to be commended for its labors to provide independent housing options to mentally ill persons. The struggles of the Mental Health Association in Los Angeles County to locate and obtain new site locations to provide services are undoubtedly troubling and frustrating. We thank you for alerting us to this dilemma regarding the Los Angeles County sign-off policy.

Thank you again for all your hard work. The City of Long Beach appreciates and commends your participation in improving the lives of its residents. We appreciate your comments and will consider your comments as we continue to work and improve the AI.

Sincerely,

BJ Willis
Development Project Manager
Neighborhood Services Bureau



MEMORANDUM

TO: LONG BEACH COMMUNITY DEVELOPMENT ADVISORY COMMITTEE (CDAC)
FROM: KATHLEEN OVERR
SUBJECT: RE: LONG BEACH CITY ANALYSIS OF IMPEDIMENTS & LEAD-BASED PAINT HAZARDS
DATE: 9/15/2003
CC: SUSANNE BROWNE, DENNIS ROCKWAY, MELANIE FALLON, GERRY MILLER, EULA WILLIAMS-HUD, BARBARA SHULL, DON SMITH

Thank you for the opportunity to submit the following comments.

I read your revised AI and I was surprised to find that we are now in agreement about the issue of lead-based paint hazards as an impediment to housing choice. I commend you for doing the additional analysis of the data. There is still a great deal of work to eliminate this impediment. We must move from treating lead poisoning with a medical model, to using a housing improvement model; improved code enforcement.

In my past comments I wrote of the overwhelming statistics confirming that when housing codes are not enforced, allowing for deteriorated paint and other hazards, children are at greater risk and often poisoned. Children in low-income and communities of color are most at risk of poisoning and of losing their housing. Cities across the country can attest to the fact that when they enforce housing codes through systematic and complaint-based inspections, poisoning rates drop. When enforcement is not enough, prosecution is necessary. We can no longer shield landlords from liability. We must send a message that essential maintenance of property is the law and is in the best interest of the owner, the property and the tenants. Currently the ones paying the greatest price are the children who are poisoned and the residents who lose options to affordable housing that is safe to live in. Families should not have to choose between a roof over their heads and poisoning their children.

One example that shows the correlation of age of housing and risk of poisoning is by taking age of housing data combined with health data showing blood lead test results and looking in area with great potential for risk. I looked at 90806 and 90813. Two zip codes that have record high numbers of poisoned children. Results showed that in census tracts 5730 to 5768, there was a range of lead levels from 20 micrograms per deciliter of blood (ug/dL) to 64 ug/dL. These children are lead poisoned according to current environmental health policy. Centers for Disease Control currently recommends medical intervention at a level of 10 ug/dL, and is considering lowering it to 5 ug/dL. At a level of 5 ug/dL a child's cognitive development is severely altered and each incremental increase of lead is equal to a loss of one IQ point. The age range of the housing stock associated with those levels was 1949-1979. Just by making the units in 90806 and 90813 lead-safe, eliminating the hazards [dust, chipping paint], requiring lead-safe work practices on all repairs and remodeling and

requiring essential maintenance practices by all owners and managers, would keep approximately **6340 units** on the market.

While the AI acknowledges that lead hazards are an impediment to housing choice, they do not lay out a plan for addressing the plan. There are creative and effective ways to address the problem of lead poisoning, a few of them mentioned in this memo, and the AI should incorporate them. Additional ways would be to focus code enforcement efforts on owners whose properties have a record of multiple violations as well as lead-based paint violations, and on all pre-1978 units beginning in identified high-risk areas. Existing state and local laws allow both Building and Health departments to cite lead paint violations, before a child is poisoned. Equally important would be to create a work group made up of health and housing advocates and city health and code enforcement staff to design an implementation plan for Senate Bill 460, the lead law that went into effect this year. This approach, used citywide, would have a significant effect in keeping units affordable, and safe and healthy places for children to live.

I hope you will consider my comments and I look forward to your responses.

Sincerely,

Kathleen J. Overr
Legal Aid Foundation of Los Angeles



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802

October 8, 2003

Ms. Kathleen Overr
Community Health Promoter
Legal Aid Foundation of Los Angeles
110 Pine Avenue, Suite 420
Long Beach, California 90802-4421

SUBJECT: 2001 Analysis of Impediments to Fair Housing Choice for the City of Long Beach

Dear Ms. Overr:

This letter is in response to your written comments submitted at the September 17, 2003 Community Development Advisory Commission's Public Hearing on the 2001 Analysis of Impediments (AI) to Fair Housing Choice for the City of Long Beach.

The City has revised the AI to include an analysis of lead based paint. Based on the lead based paint statistics, the City has concluded that the effects of lead-based paint is not an impediment to fair housing choice because of membership in a protected class. The City of Long Beach recognizes that due to the age of our housing stock throughout the City, lead based paint is an issue that affects all households. The data provided shows that lead based paint is present throughout the City.

The City has programs to reduce the prevalence of lead present in homes. All rehabilitation programs must practice "Lead - Safe" measures and be tested for lead before the project is completed. The Department of Health and Human Services is implementing a Lead Based Paint Removal Program in low-income neighborhoods, especially those with young children.

The City is working to improve the maintenance of our aging housing stock by providing rehabilitation funds. All units receiving City rehabilitation funds must be tested for lead based paint. The Community Development Department is working with the Department of Health and Human Services to provide a Lead Based Paint Removal Program to remove/control all lead-based paint hazards, targeting specific census tracts, including the two zip codes mentioned in your memorandum. We are targeting 400 units of housing to be treated by September 30, 2004. This program has already transformed 108 units of pre-1940 constructed, affordable family-occupied units into "lead-safe" status. We have provided Assistance to 100 households with 45 Households having young children in the home.

The City of Long Beach appreciates and commends your effort to improve the lives of the citizens of Long Beach.

Sincerely,

B.J. Wills
Development Project Manager
Neighborhood Services Bureau

MENTAL HEALTH ADVOCACY SERVICES, INC.

A NON PROFIT ORGANIZATION PROVIDING LEGAL SERVICES TO PEOPLE WITH MENTAL AND DEVELOPMENTAL DISABILITIES

1306 WILSHIRE BOULEVARD, SUITE 102
LOS ANGELES, CA 90017

PHONE (213) 484-1628
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Senior Attorney

MARY V. WEBSTER
Staff Advocate

MADONN BRANCO
Staff Attorney

KIM McREYNOLDS BELL
Staff Attorney

REBECCA DUFAN
Staff Advocate

FERNANDO RAMIREZ
Staff Advocate

RENÉE COOK
Director of Administration
and Development

DAHYNE APOSTLE
Office Manager

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Ronnie Taub
Steven Westford

September 18, 2003

Via Facsimile and First Class Mail

B.J. Willis
City of Long Beach
444 West Ocean Blvd., Suite 1700
Long Beach, California 90802

Timothy B. Hammond, Chair
Community Development Advisory Commission
180 E. Ocean Blvd., Suite 202
Long Beach, California 90802

Tamasha Ross-Kambon, Vice Chair
Community Development Advisory Commission
2240 Atlantic Avenue
Long Beach, California 90806

Re: Draft Analysis of Impediments to Fair Housing Choice

Dear Mr. Willis and Commissioners Hammond and Ross-Kambon:

This letter memorializes Mental Health Advocacy Services' (MHAS's) statements made at the September 17, 2003 Community Development Advisory Commission public hearing on the City's Analysis of Impediments to Fair Housing Choice (AI). Because MHAS has already detailed in writing its concern with prior drafts of the City's AI, this letter will only reiterate those comments made at the September 17th public hearing.¹ We would appreciate your ensuring that a copy of this letter is provided to all other Commissioners.

City staff and its consultants have invested substantial time in drafting and amending Long Beach's AI and the Commission has also spent much time in reviewing the document and considering the concerns of the community. While it is clear that the City wishes to move forward with CDAC's approval of the AI as promptly as possible, it is neither too late nor too burdensome to make an important addition to the City's fair housing plan, Section V, and the accompanying matrix which identifies how the City will address land use and zoning impediments to fair housing choice.

¹ See MHAS letter of Sept. 18, 2001, Appendix B at 164; MHAS letter of Nov. 15, 2001, Appendix B at 175 and joint MHAS and LAFLA letter of March 7, 2002.

B.J. Willis
Timothy B. Hammond
Tamasha Ross-Kambon
September 18, 2003
Page 2

Consistent with the Department of Housing and Urban Development's recommendation, the City has identified land use and zoning regulations and procedures as an impediment to the development and siting of housing for individuals with disabilities.² However, the draft AI has only touched upon the more obvious problems related to siting restrictions in residential zones for certain types of "special group residents" with analysis limited to "senior housing" and "handicapped housing." The draft AI fails to include, for example, an analysis of how the Code impacts licensed residential care facilities and other congregate living arrangements for individuals with mental disabilities. This section of the AI also does not consider how current definitions and use classifications in the code impede the development and siting of housing for individuals with disabilities. These are just two examples of important areas that have not been considered in the impediments analysis. This incomplete analysis of impediments to fair housing choice for individuals with disabilities means that the approach to eliminating barriers to developing and siting critically needed housing in the City is inadequate.

To remedy this section of the AI, we urge the City to strengthen its fair housing planning efforts by including the following additional strategy within the land use and zoning matrix:

the City will review its zoning code to identify impediments to fair housing for individuals with disabilities, make recommendations to overcome identified impediments for compliance with federal and state fair housing laws and develop a plan for implementing the recommendations.

This strategy provides the City with an opportunity to address fair housing compliance in a comprehensive manner and move forward in amending or revising its Code where necessary.³ Not only is this recommendation in keeping with the City's obligation to affirmatively further fair housing, but additionally, it would likely satisfy the state Housing Element requirement that all jurisdictions identify land use and zoning barriers to special needs housing and eliminate those barriers.⁴

At the public hearing, a number of Commission members expressed concern upon learning of the difficulties that mental health providers have in siting critically needed housing programs within the City. The inclusion of a comprehensive review of the City's

² Fair Housing Planning Guide (U.S. Department of Housing and Urban Development, Office of FHEO), Vol. I, at 2-31, 4-5 (public sector AI subject areas).

³ The City of Los Angeles has just completed a review of its zoning code and land use practices from a fair housing perspective and planning staff is now considering recommendations set forth in that study. The study can be accessed at www.lacity.org, within the housing department section.

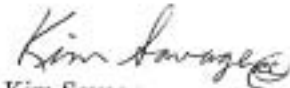
⁴ Cal. Gov't Code 65583.

B.J. Willis
Timothy B. Hammond
Tamasha Ross-Kambon
September 18, 2003
Page 3

zoning code as an AI strategy provides an effective method of addressing regulatory and procedural barriers to the development and siting of housing for individuals with disabilities.

MHAS appreciates your consideration of these comments and we are available to respond to any questions you may have after reviewing this letter.

Sincerely,



Kim Savage
Senior Attorney

KS:rc

cc: Eula Williams, HUD Los Angeles Office
Dennis Thys, City of Long Beach



CITY OF LONG BEACH

DEPARTMENT OF COMMUNITY DEVELOPMENT

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802

September 15, 2003

City of Long Beach
Planning Commission
Department of Planning and Building
333 West Ocean Boulevard
Long Beach, California 90802

Dear Commissioners:

The U.S. Department of Housing and Urban Development (HUD) requires all local entitlement jurisdictions receiving grant funding through Community Planning and Development (CPD) programs to engage in fair housing planning and certify that it will take "actions to affirmatively further fair housing." Included in these programs are Community Development Block Grant (CDBG); Home Investment Partnership (HOME); and Emergency Shelter Grant (ESG).

As a result, HUD requires all jurisdictions that receive CPD funds to complete an "Analysis of Impediments to Fair Housing Choice (AI)." Entitlement jurisdictions, including the City of Long Beach are required to conduct an analysis to determine the impediments to fair housing choice for its housing and community development programs and activities. HUD defines "impediments to fair housing choice" as "any actions, omissions, or decisions made on the basis of race, color, religion, sex, handicap (disability), familial status or national origin that restricts housing choice or the availability of housing choices of people in these protected classes". In addition to the HUD protected classes, the state of California expands protected coverage to include marital status, ancestry, sexual orientation or arbitrary characteristics, such as age or sources of income.

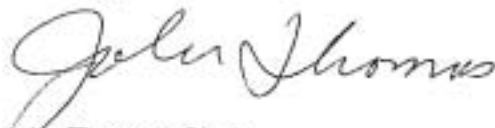
The Analysis to Impediments (AI) addresses the City of Long Beach land use and zoning policies. The Community Development Advisory Commission (CDAC) would like to raise two zoning issues that were identified that may directly or indirectly be considered as impediments to fair housing. "Senior Citizen Housing" zoning code distinguishes Senior Citizen Housing from Single-Family Residential and Multi-Family Residential uses by the application of a conditional use permit. This distinction can be perceived as discriminatory when senior housing is subjected to Special Use Permit requirements when not equally imposed on other similar single-family residential or multi-family residential uses. Senior housing is also not permitted or conditionally permitted in commercial zoning districts in which multi-family housing is permitted. The Analysis of Impediments suggests that Senior Citizen Housing be defined and listed under appropriate zoning classification so that it is treated identically to standard Single-Family Residential and Multi-Family Residential.

The other issue identified "Social Service Office (without food distribution)" zoning code requires non-profit organizations to apply for a Conditional Use Permit (CUP) for offices for business transactions and service provision while other type of organizations (for-profit organizations) are not so required. This may result in all persons (including protected classes of persons, and the non-profit agencies that serve them) could be subjected to disparate treatment and institutional bias. The Analysis of Impediments suggests that use classification of Social Service Office (without food distribution) and the use classification Professional Services should be treated identically.

In conclusion, the Community Development Advisory Commission requests that you consider the Analysis of Impediment's identified zoning & land use policies of the City, and request that you take the appropriate actions necessary to address these potential barriers to fair housing choice.

Your consideration of this issue is greatly appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Thomas".

John Thomas, Chair
Community Development Advisory Commission

cc: Community Development Advisory Commission Members
Fady Matar, Acting Director of Planning and Building
Melanie Fallon, Director of Community Development

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SUSANNE BROWNE

Hello, my name is Susanne Browne, and I am a Housing Attorney at the Legal Aid Foundation of Los Angeles. I'm handing out three documents to you. The first one is a copy of comments I drafted from Legal Aid; the second is comments from Kathleen Overr, who is our lead outreach worker, and she specifically addresses the issue of lead; the third is HUD's February 7, 2003, decision letter about our complaints on the 2001 Analysis of Impediments to Fair Housing (AI). As was mentioned earlier, Legal Aid and Mental Health Advocacy Services filed a complaint in March of 2002 challenging the sufficiency of the city's AI. In February 2003, HUD issued a decision letter telling the city that it needed to make a number of revisions based on our complaint. Legal Aid appreciates all the work that the city has done to revise the AI and the great work of the Fair Housing Foundation, but we're here today to point out to you that there are still a number of deficiencies with the AI and that a number of the directives from HUD have not been satisfied in the latest draft of the AI. The first problem with the AI is that it incorrectly states that the citizen participation requirements of the Consolidated Plan do not apply to the AI. HUD's decision letter of February 2003 clearly states that the citizen participation requirements of the Con Plan apply to the AI. The city's AI still, nonetheless, says the exact opposite. This statement in the AI must be changed. Because the city has alleged that the citizen participation requirements of the AI do not apply, I'm sorry, of the Con Plan do not apply to the AI, it is safe to assume that the city hasn't followed those requirements like it was supposed to. In short, the Consolidated Plan's citizen participation requirements require that the city consult with public and private agencies, adopt a citizen participation plan, encourage citizen participation, provide citizens a comment period of at least 30 days, accept comments orally and in writing, and consider comments in preparing the final draft. It is clear that at a minimum the city has not complied with three of these requirements in the draft of the AI. It has not consulted with public and private agencies; it has not adopted a citizen participation plan, and it has not encouraged citizen participation. The only outreach that was done was that the AI was mailed to a number of community based organizations whose names I provided the city with. The city didn't send them a letter saying what the AI was, what it should be in, or how they could get meaningful input on the AI; and, in fact, many of those agencies who received copies of the AI, who might be here to testify, called me to find out what the AI was about and how they could become a part of it because the city did not make that clear in just sending the document to them. The second deficiency with the AI revolves around the issue of lead based paint. In our complaint to HUD we alleged that the AI was deficient because the city did not acknowledge that lead based paint was an impediment to fair housing. We are extremely pleased that the city has changed its mind in eh latest draft and it now says that lead based paint is an impediment to fair housing. Unfortunately, the analysis of lead is meaningless because it does not go on to say how the city is going to address the impediment. A key aspect of an AI is that it has to set forth specific actions with time frames as to how impediments are going to be addressed, and that discussion is absent from lead. It acknowledges lead as an impediment; it says things that it has done in the past; it talks nothing of future actions. The analysis needs to be amended to include that discussion. Third, the AI is deficient because it fails to address the

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prohibition of social services on Anaheim Street in the City of Long Beach. There was an Anaheim Street Moratorium that was in existence at the time our complaint was filed. The city failed to provide an analysis of that. HUD instructed it to do so. This Moratorium prevented social services on Anaheim Street in the City of Long Beach. That Moratorium has now been replaced with a permanent zoning change. That permanent zoning change similarly prohibits social services with food outright, and social services without food are only allowed with an administrative use permit. The city's AI now needs to provide an analysis of the permanent zoning change. Instead of doing that city has said since the Moratorium is gone they don't have to provide an analysis. I believe that willfully misrepresents what HUD has directed the city to do. Fourth, the matrix for impediments to fair housing is incomplete. HUD ordered the city to produce a matrix, which is a very key point of an AI; it sets forth each action the city is going to take to overcome the impediments, timelines, and money allocated for those. The city did put a matrix its most recent draft of the AI, but parts of it are empty, it is vague, it is incomplete, and many of the actions do not have monies allocated towards them, that needs to be rectified. Finally, the AI is insufficient in that HUD has instructed the city to make a number of revisions to it that it has not made. In February of 1997, HUD sent a letter to the city telling it that there were problems with its 1996 AI. The city wrote a letter back saying that they would fix that in their 2001 AI. They didn't fix it in their 2001 AI, and those problems still remain in the latest draft of the AI. In particular, the city needs to address the policies and practices that connect transportation and social services with housing opportunities -- Whether government services are provided equally throughout all neighborhoods and the policies and practices of local housing agencies. Although the city has included a brief section on local public housing agencies, the problem is that the analysis is meaningless. It gives a brief overview of the City of Long Beach Housing Authority and the County of LA Housing Authority, but it doesn't talk about what other policies and practices constitute an impediment to fair housing. It doesn't look at what other housing materials are translated into multiple languages, whether they have sufficient staff to assist limited English persons, whether they have a proportionate number of African-Americans on Section 8 as compared to the city at large. And this is the key of an AI. You don't just give a general description or talk about a problem, but you have to say whether it constitutes an impediment to fair housing; and, if so, how you are going to address that.

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LAURA SANCHEZ

Good morning. I'm a representative of the Long Beach Area Coalition for the Homeless. And I realize you are dealing with fair housing practices; homeless people by definition don't have housing. I want to call your attention to the fact that a large portion – 5,845 – a little more than 1-¼ of the Long Beach population is homeless. And among the homeless people are people in the protective classes that are being dealt with in the Analysis of Impediments – there are people who are old; there are people who are disabled (physically and emotionally – mentally); there are single heads of households -- single female heads of household constitute 80% of the homeless families. And there are racial differences from the city population among the population of homeless people. I passed out a letter that all this is included in, and I compared it with the 2000 census figures that I got from the demographics web site for Long Beach. I'm not sure, the way I read the figures, put the White Caucasian population at 45 percent of the Long Beach population. The figure you have used in the AI was 33 percent. I found that was difficult to figure out in the way the census figures are, but any way there is a great majority of African American people who are homeless – 45.7 percent of the homeless population is black or African American, while only 14.9 percent of the city population. And, as in other areas that were spoken of in the presentation, Asian Americans and other categories—Native Americans and others, are much underrepresented in the homeless population. There is another one of the classes that is involved here – that is source of income. The source of income of homeless people is sometimes from general relief, sometimes from very low income wages. Many of our homeless are working, and they don't earn enough money to be able to afford housing – and that gets into the affordable housing thing, which is not the point of the Analysis of Impediments. I urge you to consider this part of Long Beach's population along with the rest of the population you are involved with.

Now, I want to say something -- that I am very pleased with in the Analysis of Impediments and the Homeless Coalition advocacy, the people who worked on this – that you have recommended changes to the zoning ordinances in Long Beach to allow social services in all areas of the city – social services without food – without requiring, I guess it is an administrative use permit, I called it a conditional use permit, I've got my terminology off – but hopefully that will go forward as well as zoning changes to all emergency shelter and to allow transitional housing. We recommend that single room occupancy dwellings also be allowed as that would provide low rent housing, which is much needed. Many of our homeless people need services in order to be able to become employable and have a steady income. But when they get out of the services, they need places they can afford in order to be able to live; otherwise, they get their help for problems they have – get training to be able to be employed and still have such low income they can't afford a place to live. But we really are pleased with the zoning changes you recommended, and we too miss the specific actions that are to be taken and the timeline for getting them accomplished. We'd like to hold you to keeping after, I think it would be City Council, to make the zoning changes as soon as possible – within the next year. Thank you.

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JAMES BROWN

Hi, my name is James Brown. I represent the Community Action Network here in the City of Long Beach, which is a network of the homeless and formally homeless, and we advocate for the rights and need of the homeless as well as the formally homeless. The first thing I would like to say is that I support the comments that were made from the two previous speakers, Susanne Browne from Legal Aid as well as the Homeless Coalition. But to that we would also like to add that – first, myself I read that thing and it's not that complicated, yet there were some things that I could not quite figure out. As in the results, in terms of discrimination and segregation, they define them as no evidence inconclusive pending in found violations. Without somebody to tell me the criteria that was used in determining what is inclusive and what is not that leaves a lot of ground in there between the eight with no evidence and the two that were found with violations – that leaves ten – that I'm not sure what was actually done or said or in fact what was the problem, so I don't know where they would stand. The other thing I would like to say is that in terms of discrimination I read the AI, and what it says about segregation is simply that trends can be found or seen or something like that. We'd like to ask that in terms of segregation and discrimination that the wording be made a lot stronger – it does not say that anybody must do anything. From what I've seen in terms of the number of Blacks and Hispanics reporting that they think they are discriminated against and from the report that I read, it seems one thing is evident to me that we know we are being discriminated against, and other people know we are being discriminated against. I think the time now is not to get wound up in reports as to determine the fine points of why there are people being discriminated against in terms of housing, but as to action I think I'd be asking today is that this group look strongly in terms of action and not so much to reports because we know it's out there and we'd like to see something done about it – preferably in our lifetime or before my kids need to buy a house or need an apartment. Thank you.

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KIM SAVAGE

Good morning. My name is Kim Savage. I'm an attorney with Mental Health Advocacy Services, which is a public interest law office in Los Angeles. We represent individuals with mental and developmental disabilities. Early on, I submitted comments regarding the draft AI, and there have been significant changes – a lot of time and effort put into it I am going to speak specifically to the analysis regarding land use and zoning impediments, but I want to first make a couple of broad and general comments regarding the AI. Contrary to what you have heard this morning, the AI is a fair housing planning document; it is not just a document; it is a road map; you can look in your Analysis of Impediments at page 153 and see that HUD has written a letter to the city; it has written a number of letters to the city, but it cites the statute, which clearly indicates that this is a document in which you identify impediments to fair housing for members of protected classes and you develop a road map and you have record keeping. So, this is a very important document. It is not really an esoteric document. If you step back, it is very simple. Housing is a basic need of everybody in this city, and the city has a statutory obligation to affirmatively further housing, and this document is a road map to do it, which is why many advocates in this room are paying so much attention to it. It is a way for us to commit the city to do certain things. And in the area of land use and zoning, where I specialize -- I have to say, initially, I'm very happy that the city has actually identified this as an impediment and something important to look at because despite HUD's advice to all jurisdictions that they do this, many jurisdictions, in fact, don't do that. But there is a significant amount of work that still needs to be done. Yes, there is an identification of certain impediments regarding senior housing and handicapped housing, which by the way, is a very obsolete term that really has no meaning at all considering that we now have accessibility guidelines. But there is a whole lot of work that is still left to be done. For individuals with disabilities, particularly individuals with mental disabilities, there is a need to discuss the siting of licensed residential care facilities and a great variety of other congregate living arrangements. – the code is very restrictive. I'm not going to take your time and go into all the details, but what I recommend is that the city strengthen its matrix in this area and recommend a full analysis of the city's zoning code and that there be recommendations for amendments and revisions all for the purpose of making sure that the City of Long Beach complies with the Fair Housing Act. Thank you.

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CHARLES BELKNAP

My name is Charles Belknap; I'm the housing director for the Mental Health Association. Thank you for allowing me to speak. I'm here to identify a significant impediment to fair housing that's not listed in the draft. Mental Health Association in the past three years has made at least five unsuccessful attempts to open sites for support services for people with mental illnesses. These sites are necessary for people with disability or mental illness to live successfully independently in their own apartments. Without support services there can be no fair housing for such disabled people. This is not just something that we hold as our personal opinion, but has also been recognized in court with the Olmstead ruling, and I think the Olmstead ruling should be referred to in your document -- also, George Bush's Executive Order on community based alternatives for individuals with disabilities -- it lays this out very clearly, and so does Title II of ADA. The problem for us is not really a problem of zoning as much as it is a problem of the way in which funding is done for mental illness. Almost all funding for mental illness comes from the state to the county and is distributed to the county. The county supervisors require that if we are going to open a new piece of real estate for lease or purchase they need to have a sign off of that site from the local county supervisor. The local county supervisor will not sign off on that site unless the local City Council person signs off on it. The local City Council person, not wanting to take the rap for having people with mental illnesses go into the neighborhood, says you have to talk to the neighborhood association. We've lost \$10-20-30-40,000 doing this, making these attempts, buying options on land, buying options on leases -- buying land and having to resell it. This is a major obstacle, and it needs to be mentioned in this document. Thank you.

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JOSH BUTLER

Good morning. My name is Josh Butler and I'm from the Disabled Resources Center here in Long Beach. After review of the City of Long Beach's Analysis of Impediments to Fair Housing Choice, the Disabled Resources Center has some concerns in the area of persons with disabilities. The Disabled Resources Center is an independent living center which works to empower people with disabilities to live independently in the community, to make their own decisions about their lives, and to advocate on their own behalf. To that end, our primary concern is that affordable and accessible housing are made available to persons with disabilities. And one of those areas that can address that is the area of audits conducted by the Fair Housing Foundation. In the area of random audits, it has come to our attention that in between 1996 and 2000 only three audits, or 1.4 percent, were conducted involving issues of discrimination towards persons with disabilities; however, according to page 48 of the AI, 113 persons, or 13.3 percent, with either physical or mental disability contacted the Fair Housing Foundation with a housing concern based on discrimination issues. Page 43 of the AI reflects 59, or 9.1 percent, of those that contacted the Fair Housing Foundation regarding a discrimination issue had cases open for investigation. Disabled Resources Center recommends that this gap be closed so that the amount of random audits that are conducted better reflects the number of complaints and cases open regarding issues of discrimination towards persons with disabilities. Disabled Resources Center does agree with FHF, and I quote, "that conducting good random sampling, at least 10" would be a remedy to this problem. So, 10 annual audits in the area of discrimination towards people with mental and physical disabilities would be a positive step towards increasing housing opportunities for people with disabilities. With the lack of affordable and accessible housing in the City of Long Beach, reducing the level of discrimination is imperative. Many times when people pass those first two barriers – affordability and accessibility – they have to deal with a discriminatory landlord. We must increase our audits to ensure that people with disabilities are not being rejected from places they can rent, because those places are few and far between. Thank you very much.

JOHN MALVEAU

John Malveau, Central Area Association. I'd like to thank the city and Fair Housing Foundation for a comprehensive and very excellent report. Additionally, we'd like to thank the Legal Aid Foundation and Mental Health Advocacy Services for complementary work to that report. These two organizations are not adversaries, but contributing to the well being of our city. And we urge that their revisions be adopted.